

# Fermentalg Ethical Charter

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The Ethical Charter defines the principles and values that guide the actions of Fermentalg, its representatives and employees, in their relations with their suppliers and service providers, their clients and the public authorities in France and abroad.

As an ethical, socially responsible and environmentally friendly company, Fermentalg attaches the utmost importance to the fair treatment of its employees, customers, suppliers and service providers, public authorities, investors and other stakeholders. Furthermore, Fermentalg formally condemns all forms of corruption and is strongly committed to respecting laws and regulations.

All Fermentalg executives and managers ensure that the principles set forth in the Ethics Charter are applied in practice.

The purpose of the Ethics Charter is to

- State the fundamental ethical principles for activities and behaviors,
- Define the ethical framework that must be respected in the context of professional relations.

The scope of application of this document extends to everyone, managers and employees. These persons are referred to in this document as "persons covered by the Ethics Charter".

## 1-Rules of conduct

### 1.1 Fermentalg is based on the ethical principles of integrity, honesty and transparency, maintaining at all times good faith behavior

All persons covered by the Ethics Charter shall act proactively, responsibly and efficiently to ensure that Fermentalg achieves its goals. They shall do so in an honest and transparent manner, maintaining at all times behavior based on good faith to all persons subject to the Ethics Charter and to other stakeholders.

### 1.2 Fermentalg complies with the regulations applicable in each country where it operates

All persons covered by the Ethics Charter shall comply with the regulations of the countries where Fermentalg operates.

### 1.3. Compliance with the United Nations Global Compact

Fermentalg respects the principles of the United Nations Global Compact concerning behavior and actions in the areas of human rights, labor, the environment and the fight against corruption.

Respect for Human Rights: Fermentalg protects and respects universally recognized fundamental human rights in its area of activity and ensures that it is not complicit in human rights violations.

Respect of the Labor Law: Fermentalg guarantees the respect of :

- Freedom of association and the right to collective bargaining
- The elimination of all forms of forced or coerced labor
- The elimination of discrimination in employment

Respect for the Environment: Fermentalg promotes environmental responsibility through its responsible purchasing policy and encourages the development and dissemination of environmentally friendly solutions.

#### **1.4. Fight against corruption and influence peddling**

Fermentalg does not tolerate any act of corruption or influence peddling in any form whatsoever.

Fermentalg prohibits the following actions by persons covered by the Ethics Charter, its suppliers and partners

- Performing any act that may give rise to the belief that a violation of the Regulations on bribery or trading in influence has been committed,
- Offering or receiving any advantage from a natural or legal person belonging to the public or private sector, on national or international territory, and/or performing or having performed any action whose purpose is to compromise the objectivity and transparency of any decision-making process for the benefit, directly or indirectly, of Fermentalg and/or the persons covered by the Charter.

Anyone within the company who is aware of or has any doubts about corruption, conflict of interest or influence peddling must inform his or her superiors or the Ethics Officer.

#### **1.5. Compliance with financial and accounting rules and standards**

Fermentalg's economic and financial information must give a true and fair view of its economic and financial situation, in accordance with generally accepted accounting principles and applicable international financial reporting standards. No person covered by the Ethics Charter shall conceal or alter the information contained in the company's financial reports and accounting documents, which must be complete, accurate and true.

#### **1.6. Compliance with tax rules**

Fermentalg complies with national and international tax regulations.

#### **1.7. Protection of Intellectual and Industrial Property**

Intellectual and industrial property created by Fermentalg employees remains the property of the company within the framework of applicable regulations.

All persons covered by the Ethical Charter shall endeavor to protect patents, trademarks, copyrights, trade secrets and any other information subject to intellectual and industrial property rights held by Fermentalg.

### **1.8. Competition**

Persons covered by the Ethical Charter must respect the principles and rules for fair competition and must not violate the laws protecting competition. All agreements between Fermentalg and third parties that could have a negative effect on competition are subject to prior legal review.

### **1.9. Fermentalg avoids that the personal situation of the persons covered by the Ethical Charter is in direct or indirect conflict with the company's interests**

Persons covered by the Ethics Charter must avoid any situation in which their personal interests and the interests of persons related to them may conflict with the interests of Fermentalg. If such persons find themselves in a situation of conflict of interest, they must notify the Ethics Officer within Fermentalg.

Declarations must be made without delay to the ethics referent, who will select the relevant pair to assist him after a conflict of interest situation, actual or potential, has been identified and, in any case, before a decision that could be affected by the potential conflict of interest is taken. In addition, any change in or termination of such a situation must be declared to the Ethics Officer.

In the event of a potential conflict of interest, individuals covered by the Ethics Charter :

- Shall not receive personal benefits for themselves or related persons due to their position within Fermentalg;
- May not engage in professional activities identical to the professional activities they perform for Fermentalg if this would interfere with the interests of Fermentalg.

### **1.10. Fermentalg adopts a rigorous approach to the handling of information**

Fermentalg considers the information it holds to be an essential asset for the management of its business. Information and know-how are therefore particularly protected. For this reason, persons under the Ethics Charter must treat information and knowledge in such a way that it is protected accordingly.

- Sincerity:

Truthfulness of information is an essential principle, so that persons under the Charter who have information to communicate, both inside and outside the organization, must ensure its truthfulness.

All internal and/or external financial transactions of Fermentalg must be clearly, accurately and fairly reflected in communications and documents.

- Business secrecy:

Persons covered by the Ethics Charter must respect the confidentiality of business secret information, even after they leave Fermentalg.

When the confidential information in question belongs to Fermentalg, persons covered by the Ethics Charter shall not disclose this information to third parties (including their personal and family relations).

When the confidential information belongs to external third parties, the persons covered by the Ethics Charter must respect the confidentiality agreements related to it.

### 1.11. Reputation of Fermentalg

Information about Fermentalg must be transparent, truthful and consistent. All persons covered by the Ethics Charter shall take great care to maintain the good image and reputation of Fermentalg in their professional activities. Whenever they appear or present themselves on their own initiative as employees, directors or representatives of Fermentalg in social media (Internet, social networks, etc.), they must ensure that they give a correct and appropriate image of Fermentalg and that the respect of the promoted ethical values is guaranteed.

### 1.12. Use and Protection of Fermentalg's Assets

- Assets

The persons covered by the Ethics Charter shall protect Fermentalg's assets. They shall ensure that Fermentalg's assets are used effectively and appropriately, and that inappropriate use is avoided. Fermentalg's assets may only be used for its benefit.

- Information and Communication Systems

The information and communication systems are to be used primarily for business purposes. Fermentalg reserves the right to control and regulate the private use of information and communication systems, subject to legal provisions.

### 1.13. Fermentalg guarantees equal opportunities and non-discrimination to its stakeholders

- Labour Relations

Fermentalg does not accept any harassment in the workplace.

Fermentalg guarantees equal opportunities and freedom from discrimination on the basis of gender, country of origin, religion, belief, age, physical characteristics, sexual orientation, nationality, political views, marital status or disability.

Equal opportunity applies at the time of hiring and throughout one's career.

Fermentalg promotes policies that encourage the necessary balance between personal or family life and professional life.

- o Selection and promotion

Persons covered by the Ethics Charter are recruited and promoted on the basis of their skills, their ability to carry out their missions and achieve their objectives, and their professional integrity.

- o Training

All persons covered by the Ethics Charter must take part in the training courses set up by Fermentalg in order to complete their knowledge of the Regulations in force and of the Internal Regulations, in relation to the functions and activities they perform.

- o Information of persons

The information provided to the persons covered by the Ethics Charter must be precise as to the evaluation of their performance and the objectives to be reached.

- o Working conditions

The working conditions must be safe for the health of the people. Fermentalg also ensures that its suppliers and partners apply the rules and regulations regarding health and safety at work.

- Relationship with customers

Fermentalg strives to define, design and offer its customers the best quality product. To this end, Fermentalg has a commitment to implement the necessary resources and measures to ensure the best quality of its offer. The people covered by the Ethical Charter must treat customers fairly, provide them with accurate information and always strive to provide excellent service.

- Relationships with suppliers
  - o Selection

Supplier selection processes must respect the principles of fairness, objectivity and transparency. Selection is based primarily on the criteria of quality, cost and delivery times. When selecting a supplier, the persons covered by the Ethics Charter must avoid situations in which their personal interests would conflict with the interests of Fermentalg companies. Such situations must be reported to the Ethics Committee.

- o Contracts

All contracts must include anti-corruption clauses and clauses accepting the Fermentalg Ethics Charter. Environmental and social clauses will also be included. In addition, the selected suppliers must respect the principles defined in the United Nations Global Compact.

The contractual conditions agreed between the parties must be respected.

## 2 Knowledge and training on Fermentalg's Ethics Charter

Fermentalg's Human Resources Department brings the Ethics Charter to the attention of its employees, especially when new employees are hired.

When dealing with stakeholders, Fermentalg must inform them of the existence of the Ethics Charter and of the need to comply with it as far as they are concerned.

Fermentalg will mention the existence of its ethics alert system on its website.

## 3 Compliance with the Fermentalg Ethics Charter

All persons covered by the Ethics Charter must comply with it. The same applies to other stakeholders for the elements of the Ethics Charter that concern them.

### 3.1. Action in case of violation

We must all ensure that these provisions are respected, and more specifically the provisions relating to the obligation of integrity and respect for the values and ethical principles defended by Fermentalg.

Fermentalg expects everyone to commit to :

- not to remain impassive in front of a situation contrary to this obligation;
- report any facts they may have witnessed.

Fermentalg has set up a 3-level protocol for recourse in the event of a violation of the Ethics Charter on which Fermentalg bases its action.

Level 1: the reporting of the facts goes first through the hierarchical channel, managers and/or the HRD for the treatment of the alert given. Any sanctions that may be taken will be in application of the regulations in force within the company. The HR Department will report to the Ethics Officer and to the Chairman and CEO.

If none of these means is possible or available, the matter should be referred to the Ethics Officer, who will be responsible for handling the alert.

Level 2: to deal with the alert, the Ethics Officer will form a pair with either a member of the Works Council or a member of the Management concerned. This pair is bound by an obligation of confidentiality regarding the information to which they may have access in the context of their mission. They must, in general, observe reserve and restraint in the exercise of their mission.

Level 3: In the event that the violation of the Ethics Charter cannot be resolved by the above two people, the Ethics Officer must then refer the matter to the member of the Board of Directors responsible for ethical issues.

### **3.2. Mechanism for referring cases to the Ethics Officer and for handling alerts**

The Ethics Officer may be contacted :

- By e-mail at the following address: [compliance@fermentalg.com](mailto:compliance@fermentalg.com)
- By mail: Fermentalg (Ethics Referent) - 4 rue Rivière - 33500 Libourne.

This system is also available to all those who need help or advice on the content of the Charter and its implementation, and who have not obtained answers from their hierarchy.

Upon receipt of the report, the Ethics Officer will be responsible for handling the alert as quickly as possible (maximum 48 hours for handling and one month for processing) and in compliance with the principles of confidentiality, impartiality and presumption of innocence.

Any investigation will also be conducted in accordance with the applicable local legislation, in particular with regard to respect for the adversarial process.

Once the report has been received, the Ethics Officer will qualify it:

- By ensuring that the facts reported fall within the scope of the present Ethics Charter,
- By entrusting the investigations to be carried out to the department best able to identify, characterize and deal with the facts reported.

The investigation phase follows, during which everyone is required to cooperate fully and completely and to provide, upon request, all useful information and documents.

The accused person will be informed of the nature of the allegations made against him or her. Information may not be provided immediately if it is necessary, for example, to verify facts, preserve evidence or refer the matter to the appropriate authorities.

Information will be shared only with those who have a legitimate need to know in order to investigate and process the report and/or take appropriate action.

The department in charge of the investigations communicates a report to the Ethics Advisor, who is responsible, together with his or her partner, for informing the Chairman and CEO, who will decide what decisions to take to put an end to the problem, to sanction the facts and to prevent the risk.

It should be noted that any person acting in "good faith" will not or may not be sanctioned or subjected to reprisals for having reported actual or potential corruption, influence peddling, unfairness, conflict of interest, discrimination or harassment, in compliance with the present reporting procedure.

Good faith" here means that at the time of implementing this procedure, complete and honest information is provided, even if it is later found to be erroneous.

Anyone who believes that he or she is being retaliated against should report it immediately and through the same channels as described above.

On the other hand, any false or defamatory report with an objective contrary to our stakes of neutrality, equity and respect, could be equally sanctioned.

### **3.3 Sanctions for non-compliance with the Charter**

Non-compliance with the Code of Ethics may result in severe penalties for the Company, but also, on an individual basis, for any manager or employee concerned by a breach of these principles.

Actions contrary to the principles of the Code of Ethics may also result in economic, image and reputational damage for the company.

They may also lead to

Disciplinary (e.g., dismissal for gross misconduct), civil (e.g., damages) and criminal (e.g., fines and/or imprisonment) sanctions to be implemented against an employee who is at the origin of such conduct,

The termination of any business relationship with a business partner who does not act in accordance with the values and principles of the Ethics Charter.