

CODE OF ETHICS

METAL SOLUTIONS BUSINESS UNIT

1. GENERAL

The word "ethics" comes from the Ancient Greek "ethos" which means "place of life, habit, customs" and from the Latin "ethicus", morality. This therefore implies that ethics would be similar to a guide to good practices to be adopted for oneself and for others. We live in community, which is why it seems fundamental that we do not act selfishly but on the contrary, always keeping "the other" in mind. Work is a place where we spend most of our time, hence the need to establish a pleasant and trusting climate with our employees. Thus, it is necessary to acquire certain personal and organizational values. The present ethical charter must reflect the vision and culture of the company.

Each of our employees is asked to read this code of ethics, to understand its content and to respect it. It is up to everyone, in the event of questions or doubts about the conduct they should adopt, to consult their hierarchy or the management of the Business Unit.

This charter also defines the ethical requirements applicable to suppliers of companies in the Metal Solutions Business Unit of the KEP Technologies group. It is the appendix of the "general conditions of purchase" relating to orders placed. By accepting the order, the Supplier undertakes to comply with the provisions appearing in this charter by ensuring that its personnel are made aware of the importance of ethical behavior.

2. RELATION TO PEOPLE

2.1 Employment Practices

KEP Technologies considers all of its employees with fairness, ethics, respect and dignity. We provide equal employment opportunities to all, regardless of age, gender, sexual orientation, disability, religion, marital status, country of origin, or any other factor it would be. The diversity of our employees and the coexistence of varied profiles encourage innovation and constitute essential assets for our performance and our development. Promotions are made solely on the basis of professional qualities and results.

2.2 Child labor

KEP Technologies refuses to employ employees who are under the minimum legal age provided for by local law or who have not completed their compulsory schooling and, in any case, who are under 16 years old. No one under the age of 18 may perform dangerous or night work in our company.

2.3 Illegal employment

We do not tolerate illegal employment defined by the following six offences: concealed work, haggling, illicit loan of labour, employment of foreign employees without a work permit, irregular accumulation of jobs, fraud or false declaration.

2.4 Harassment and personal safety

We prohibit all forms of harassment, intimidation and victimization, whether sexual, physical or psychological in nature. Each employee has the right to a positive, harmonious and professional work environment and must in turn behave in such a way as to maintain such a working climate. The safety and health of all are an essential objective of the group. To ensure their own safety and that of their colleagues, our employees must agree not to perform their duties while impaired by a substance likely to alter their good judgment or interfere with the safe, efficient and responsible for their tasks.

2.5 Personal data protection

In accordance with the French law "Informatique et Libertés" of January 6, 1978 as amended and the European Regulation n°2016/679 of April 27, 2016, KEP TECHNOLOGIES and its entities in its capacity of Data Controller collects the above information for the management of its sales and within the framework of the execution of contractual obligations. The data collected will be communicated only to the following recipients: managers, sales departments, commercial agents, accountants. The data is kept for the duration of the contractual relationship and for a further 5 years in accordance with the statute of prescriptions applicable to contracts. Data may be transferred outside the European Union depending on the nationality of the customer. You may access your data, rectify it, or exercise your right to limit the processing of your data. You may also object to the processing of your data, and finally you may determine what happens to your data after your death. To exercise these rights or for any question about the processing of your data in this system, dpo@kep-technologies.com, or by post to KEP TECHNOLOGIES - 1198 AV DR MAURICE DONAT - 06250 MOUGINS. You may be asked to provide proof of identity if you have reasonable doubts about your identity. If, after having contacted us, you feel that your "Data Protection" rights have not been respected, you may submit a complaint to the CNIL.

3. RELATION TO PRODUCTS

3.1 Product quality and safety

The quality and safety of the products we provide to our customers represent a fundamental value of KEP Technologies. For no reason should we compromise on product quality or safety. In order to fulfill our commitment, we must respect all the rules relating to quality controls. We all need to understand our role and responsibilities with regard to quality throughout the product life cycle and are responsible for preventing and remedying any problems that may arise.

3.2 Counterfeits

KEP Technologies prohibits any act of counterfeiting and carries out a prevention approach with its purchasing departments in order to avoid the use of dubious suppliers. We are also careful to identify and eliminate counterfeit parts and materials to exclude them from the final product. KEP Technologies asks its suppliers to fight and prevent counterfeiting.

4. RELATION TO PRINCIPLES OF LAW AND EQUITY

In all countries where KEP Technologies operates, our staff respects the law, regulations and case law in force. Employees who work in a foreign entity of the group must comply with the legislation of the country, as well as that of the country or countries where it exercises its activities. We pay particular attention to compliance with laws, regulations and case law governing competition, export control, labor and employment, safety, health and environmental protection. In addition, for the execution of an order, KEP Technologies specifically asks its suppliers to:

- Respect the legislation of the country relating to illegal or concealed work,
- Comply with REACH and "Conflict Minerals" regulations,
- Alert it in the case of supplies that may have (i) an impact on the health and/or safety of workers and/or (ii) an environmental impact and/or (iii) present risks of counterfeiting.

5. RELATION TO MONEY

5.1 Purchasing ethics

The buyer represents the Group vis-à-vis the outside world and is often the decision-maker, partially or totally, to commit large sums of money to the Group. By its position, it is subject to assessments of value and behavior, so it is essential that the buyer be informed of the rules of ethics in force. The principles set out below must be accepted and scrupulously respected by the entire Purchasing function and the main prescribers of needs at all hierarchical levels. They set the rules of behavior for all Group personnel in relation to suppliers and subcontractors, and inform all the players concerned of the limits not to be crossed:

- During their professional relations with suppliers and subcontractors, members of staff are required, within the framework of their responsibilities, to always act in accordance with the interests of the Group and the legal provisions.
- No Group personnel may engage with suppliers and subcontractors, on their own behalf or on behalf of third parties, in commercial transactions other than those for which a mandate has been expressly given to them by the Group.
- No Group personnel may invest directly or indirectly in the capital or debt of a supplier or subcontractor, in the parent company or its subsidiaries, when relations exist between the Group and this supplier or subcontractor. -treating.
- The selection for the Group of a supplier or subcontractor of goods or services must be made on exclusively objective criteria and with transparency. Any favoritism based on family relations or friendship, on race or religion is a serious fault.

In accordance with the Ethics Charter, the Purchasing function must ensure with vigilance that the fundamental principles and rights in social, ethical and environmental protection matters are effectively respected in the subcontracting companies with which the Group maintains relations in the world. The confidentiality of all information received in the context of a consultation and relating to a supplier will be strictly respected, in particular vis-à-vis other competitors.

5.2 Presents, gifts and gratuities

It is prohibited to receive presents, gifts or gratuities from suppliers or subcontractors, whether in the form of money, material goods, services, entertainment, travel or any other form of gift if it is probable that these are intended, or could be perceived as such, to influence in an inappropriate manner with the judgment of the person receiving them. The expression "present" or "gift" refers to objects, services, favors, loans, travel, accommodation, etc. The exchange of presents or gifts may be acceptable in certain circumstances, in particular when it is part of local habits and customs.

No exception is acceptable unless authorized by the line manager and within the following limits:

- For promotional items, low-value end-of-year gifts, professional lunches or dinners scheduled at a reasonable frequency,
- The fact of accepting such a gift must in no way alter the decision-making capacity of the purchaser and the prescriber vis-à-vis the supplier.

The employee who accepts the gift must have it sent to his professional address. The personal address must not be communicated to the suppliers.

5.3 Company Assets

Company property should only be used for legitimate business purposes. KEP Technologies expects its employees to take care of its property and protect it against loss, damage, misuse and theft.

6. RELATION TO INFORMATION

6.1 Communications

Our employees are expected to be candid and sincere in their dealings with others, and not to intentionally mislead colleagues, customers or suppliers. Correct and professional language is expected of everyone, whether in written communication or verbal exchange.

6.2 Email and Internet Use

E-mail and Internet systems are made available to our staff for strictly professional purposes. It is important to remember that any electronic mail can be intercepted, create a permanent file, can be printed or forwarded to other people by the recipient. The same care must therefore be taken with e-mails as with any other type of written communication for professional purposes. Internet access and computers should never be used to view, transmit or download content that is inappropriate and does not meet professional criteria.

6.3 Confidential Information

Any information belonging to KEP Technologies that is not covered by the public disclosure requirements is considered confidential. The definition of confidential information includes any information produced by KEP Technologies or obtained in confidence from a third party and covered by a non-disclosure agreement. Financial data, strategic plans, intellectual property, bid information, personal employee information, legal documents, and customer and supplier information are examples of confidential information. It is forbidden to transmit confidential information to any person other than the person or persons for whom this information is intended. Our employees undertake to respect the confidential nature of information deemed as such even after leaving the company.

Le 12/04/2023

Sandra SCHINDLER

Direction Business Unit Metal Solutions