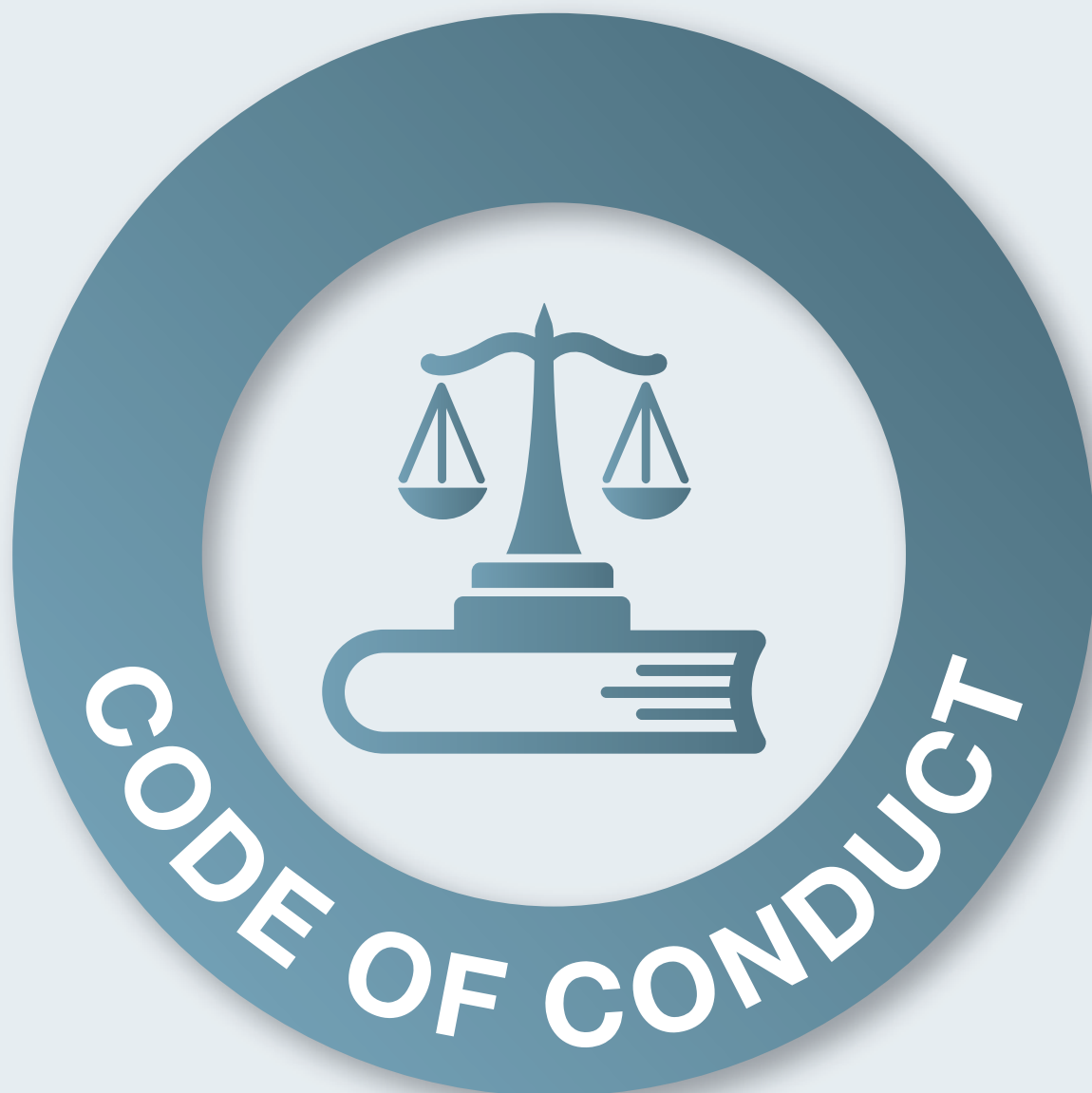


Code of Conduct

2025 version





Foreword

“Our reputation is the result of one hundred years of existence, recognised technological expertise and the interpersonal skills of the company’s employees and partners.

This human dimension, begun by the founders of the SOCOMEC Group, has over the years shaped the values which underpin the company and guide its activity: openness, commitment and responsibility. The Code of Conduct that we have in place confirms our Responsibility.

Indeed, SOCOMEC has set commitments and goals aimed at maintaining and promoting high standards regarding ethics, human rights, and sustainability through its internal Code of Conduct.

This Partner Code of Conduct represents an extension of the principles of SOCOMEC’s internal Code of Conduct. Through this Partner Code of Conduct, SOCOMEC aims to reiterate the guiding principles aimed at establishing responsible and sustainable business practices that extend to its Partners. We expect them to fully adhere to these

principles and to work in partnership with SOCOMEC to achieve our goals in terms of social responsibility, environmental responsibility, and ethical practices.

In a demanding and changing market, our Code of Conduct reinforces the essential relationship of trust that we must maintain with all SOCOMEC’s Partners.

SOCOMEC will continue to improve its performance and ensure its sustainability through the exemplary and irreproachable conduct of all its Partners.

This is why we attach so much importance to our Code of Conduct.”

Ivan STEYERT
CEO of SOCOMEC HOLDING SA

Michel KRUMENACKER
Deputy Chief Executive Officer of SOCOMEC SAS



Purpose and scope

For the purposes hereof, the term “Partner(s)” refers to SOCOMEC’s suppliers, subcontractors, customers, distributors, and industrial partners.

The term “SOCOMEC” refers to all the subsidiaries and employees of the SOCOMEC Group.

In conducting its activities, SOCOMEC commits to comply with all applicable national and international laws, regulations, and conventions related to its activities, as well as best practices, particularly in terms of labour standards and social responsibility, environmental protection, ethics, and business integrity.

SOCOMEC expects its Partners to similarly comply with the laws, regulations, conventions, and principles of business ethics applicable to its own activities.

Consequently, SOCOMEC requires its Partners to comply with the principles outlined in this Code of Conduct and to ensure that their own suppliers and subcontractors comply with all of these principles.

When national legislation or other applicable regulations and this Code cover the same subject with different standards, the highest standards or the most stringent provisions apply.

Its content will be regularly updated according to legislative, regulatory, and case law developments, as well as based on the updates of SOCOMEC’s risk mapping.



1. FOR RELATIONSHIPS OF INTEGRITY WITH OUR PARTNERS



Corruption

Corruption is defined as the act of a person invested with a public or private function soliciting or accepting a gift or any benefit with a view to carrying out, or abstaining from carrying out, an act that falls within the scope of their public or private duties.

There are two forms of corruption: “active” corruption, and “passive” corruption.

Active corruption is understood as the act of offering a gift or benefit.

Passive corruption refers to the act of accepting a gift or benefit.

In particular, a corruption offence may involve gifts and invitations, except for those expressly authorised in the

section below (“Gifts and Invitations”), or facilitation payments (unofficial payments made directly or indirectly to a public official to ensure that the act or administrative service the payment maker is entitled to will be effectively or more quickly carried out).

Any form of corruption (including passive corruption) is condemned by SOCOMEC. SOCOMEC applies a zero tolerance policy for any acts of this nature and requires its Partners to take appropriate measures to prevent, detect, and punish any acts of corruption in the context of their activities.



Gifts and invitations

The exchange of gifts and/or invitations is common in the business world and is often interpreted as a gesture of courtesy that helps strengthen established business relationships. However, these gestures must reflect healthy business relationships and uphold the principle of business transparency advocated by SOCOMEC. Their purpose should not be to influence a business decision, in which case they would constitute an act of corruption.

The Partner commits to implement a gift and invitation policy that complies with the regulations and practices in force in the countries in which it operates.

SOCOMEC employees will refuse all gifts and invitations offered prior to a decision on the awarding or renewal of a contract, particularly in the context of negotiations, a call for tenders, or during a dispute.



Influence peddling

Influence peddling involves a tripartite relationship in which a person receives or solicits (passive influence peddling) gifts in order to abuse their real or supposed influence over a public agent so that they make a favourable decision for a third party wishing to benefit from this influence, or offers gifts (active influence peddling) to someone in order to abuse their real or supposed influence over a public agent so that they make a favourable decision for a third party wishing to benefit from this influence.

SOCOMEC applies a zero tolerance policy for any acts of this nature and requires its Partners to take appropriate measures to prevent, detect, and punish any acts of influence peddling in the context of their activities.



Conflicts of interest

A conflict of interest is defined as any situation of interference between a public or professional interest and private interests, which is likely to influence or appear to influence the independent, impartial, and objective exercise of a function.

SOCOMECE requires its Partners to undertake to make every effort to prevent the occurrence of situations that create a real, apparent, or potential conflict of interest in their business relationship with any entity of SOCOMECE.

The Partner is required to notify SOCOMECE of any situation that could potentially be considered a conflict of interest and to inform SOCOMECE when an employee of SOCOMECE may have any interest in the Partner's activities or any economic ties with it.



Competition

SOCOMECE's Partners shall be committed to promoting and preserving healthy and effective competition in their business environment.

In this regard, they must refrain from any acts of unfair competition as well as any actions contrary to regulations

related to anti-competitive practices, particularly price fixing, market allocation, and abuse of dominant position.



Export control

Compliance with export control regulations is a priority for SOCOMECE. Its Partners are required to comply with all applicable national and international export control regulations and shall be committed to fulfilling their obligations regarding the obtention of all necessary licences, certificates, or authorisations and/or sending the required notifications.

SOCOMECE Partners must, in particular, check and ensure, through appropriate measures, that:

- The commercial relationship does not lead to the violation of an embargo imposed by national law, the European Union, the United States of America, and/or the United Nations, and complies with the legislations of these countries regarding trade with entities, individuals, and organisations subject to sanctions,

- The commercial relationship does not aim, except with specific authorisation, at the development or manufacturing of arms of any kind and nuclear technologies or weapons, or elements intended to be used as support for the development or manufacture of these, insofar as such use is prohibited.

SOCOMECE reserves the right at any time to suspend the business relationship if it believes that execution of the contemplated transaction poses a serious risk of constituting a violation of the aforementioned regulations and/or laws.



Environmental protection and waste management

Environment

Protecting the environment is everyone's responsibility. SOCOMEC and its Partners must act in all circumstances in compliance with the environmental laws and regulations applicable to their activities.

Consequently, SOCOMEC requests its Partners to commit to complying with and ensuring that their own subcontractors comply with the following fundamental principles:

- be open and transparent about their environmental policy,
- comply with the environmental guidelines of the Organisation for Economic Co-operation and Development (OECD) and the United Nations Global Compact,

- implement actions aimed at achieving best practices in terms of environmental regulations.

Management of WEEE waste

SOCOMEC requires its Partners to strictly comply with the rules concerning the collection and treatment of waste electrical and electronic equipment (WEEE). The Partner shall also undertake to keep itself informed of the necessary measures with the relevant national authorities.



2. FOR THE EFFECTIVE IMPLEMENTATION OF OUR ETHICAL POLICY



United Nations Global Compact

By adhering to the United Nations Global Compact in 2003, SOCOMEC is committed to respecting and promoting, within its activities and sphere of influence, ten principles related to human rights, labour standards, the environment, and the fight against corruption.

These fundamental principles have been reaffirmed by SOCOMEC voluntarily within its human rights policy.

1. Promote and respect the protection of internationally proclaimed human rights.
2. Ensure that our partners are not complicit in human rights abuses.
3. Respect the freedom of association and recognise the right to collective bargaining.
4. Eliminate all forms of forced or compulsory labour.
5. Prohibit child labour.
6. Eliminate discrimination in employment and profession.

7. Apply the principle of precaution in the face of environmental issues.
8. Undertake initiatives to promote greater environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Work against corruption in all its forms, including extortion and bribery.

Reference texts

- The Universal Declaration of Human Rights.
- The ILO's Declaration on Fundamental Principles and Rights at Work.
- The Rio Declaration on Environment and Development.
- The UN Convention against Corruption.



Corruption prevention measures

SOCOMEC whistleblowing process

Within the SOCOMEC Group, we place the utmost importance on integrity, trust, and respect for ethical principles in all our interactions.

Our ethics and compliance whistleblowing process enables all employees and partners to report or disclose any situation or event that could affect the operations, security, reputation, or integrity of the SOCOMEC Group.

To submit its report, the whistleblower is invited to use the dedicated platform:

<https://socomecgroup.integrityline.com>

This platform, administered by a third-party organisation, guarantees the confidentiality of the information provided, including the content of the reports, the identity of the whistleblower, and that of the person concerned by the report.

Each report will be carefully examined, and appropriate measures will be taken to address the identified issues.

Partner whistleblowing process

SOCOMEC's Partners must implement measures or mechanisms through which workers and stakeholders can raise concerns without fear of retaliation or negative impacts.

Control mechanisms and sanctions

SOCOMEC asks its Partners to commit to complying with the internal control and sanctions mechanisms provided for by the laws and regulations applicable to them.

For the Partner

Date:

Company:

Name:

Title:

Signature:

