



# **CODE OF ETHICS**

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## GUIDE TO USING THE CODE OF ETHICS

### WHAT IS THE CODE OF ETHICS?

The Code of Ethics is a document approved by the Management Committee of LA FOURNÉE DORÉE, which summarises the principles of conduct when carrying out Group business as well as the obligations and responsibilities of managers and other employees. The Code of Ethics is a fundamental part of the Group's programme to ensure effective prevention and reporting of violations of the laws and provisions applicable to its business.

The Code of Ethics also illustrates and formalizes the commitments made by LA FOURNÉE DORÉE as a member of the SEDEX framework. This framework itself is based on international standards such as the United Nations Guiding Principles (UNGP) and the base code of the Ethical Trading Initiative (ETI). The detailed frameworks can be accessed in full on their respective websites:

- UNGP:  
[https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)
- ETI: <https://www.ethicaltrade.org/eti-base-code>

In this respect, it is specified that Ms. Vanina MORILLON - General Director, Member of the Management Committee, is responsible for compliance of company practices with the requirements of the SMETA code of conduct. She is therefore also responsible for the implementation of internal rules and standards for conducting business ethically.





## **GUIDE TO USING THE CODE OF ETHICS**

### **FOR WHOM IS THE CODE OF ETHICS INTENDED?**

The Code of Ethics applies to the managers, employees of LA FOURNÉE DORÉE and to all persons or companies acting in the name and on behalf of LA FOURNÉE DORÉE.

LA FOURNÉE DORÉE strives to ensure that the Code of Ethics is regarded as a standard of excellence for the conduct of business by those with whom it has a lasting business relationship, such as suppliers, consultants, contractors, etc..

### **WHERE DOES THE CODE OF ETHICS APPLY?**

The Code of Ethics applies in all countries where LA FOURNÉE DORÉE is present.

### **CHARTER USER GUIDE**

#### **WHERE CAN I FIND A COPY OF THE CODE OF ETHICS?**

The Code of Ethics can be consulted on the LA FOURNÉE DORÉE website (<https://www.lafourneedoree.fr/>) and on the intranet portal, from where it can be downloaded directly.

The Code of Ethics is also sent to all new hires and made available to all Group employees in digital safes.

### **CAN THE CODE OF ETHICS BE AMENDED?**

The Code of Ethics may be revised by the LA FOURNÉE DORÉE Management Committee. Revision considers, among other things, constructive comments and suggestions received from managers, other employees and third parties, regulatory developments, and best international practices, as well as experience gained in the application of the Code itself. Any changes introduced as a result of these revisions will be published and made available as indicated above.



## CONDUCT OF BUSINESS

LA FOURNÉE DORÉE conducts its business by requiring all managers, employees, and other persons to whom the Code of Ethics is addressed, to perform their duties in a manner consistent with its conduct of business values. All managers, employees, and other recipients to whom the Code of Ethics is addressed must be aware that they represent LA FOURNÉE DORÉE and that their actions have an influence on the Group's reputation and its internal culture. Consequently, they must conduct the business of LA FOURNÉE DORÉE in accordance with the following rules:



### CONFLICT OF INTEREST SITUATIONS

All decisions taken on behalf of LA FOURNÉE DORÉE must be in the best interest of the company. Consequently, managers, employees and other recipients to whom the Code of Ethics is addressed must avoid any possible conflict of interest, specifically concerning personal, financial or family interests that could influence their independent judgement.

Any situation that constitutes or may constitute a conflict of interest must be reported immediately to the line manager or the Human Resources Department. All employees must inform their superior if they have an employment relationship - or if they hold a position as a director or officer - with a company that does not belong to LA FOURNÉE DORÉE or if they have a relationship - of a financial, commercial, professional, family or friendly nature with organisations or persons that are currently in a business relationship with the Group - that could influence the impartiality of their decisions with regard to third parties.

### INSIDER TRADING AND PROHIBITION ON USING CONFIDENTIAL INFORMATION

All managers and other employees are required to comply strictly with legislation on the misuse of confidential information (known as insider trading) in the relevant jurisdiction.

In particular, managers, employees, and other recipients to whom the Code of Ethics is addressed must not under any circumstances use (or disclose to unauthorised third parties) information that is not in the public domain, acquired by virtue of their position within LA FOURNÉE DORÉE or as a result of their business relations with LA FOURNÉE DORÉE, to gain a personal advantage or to favour other third parties.

Confidential information is always handled by managers and other employees in strict compliance with the procedures and rules defined by LA FOURNÉE DORÉE and relating to them.



## CONDUCT OF BUSINESS

### OBLIGATION OF CONFIDENTIALITY

Know-how and intellectual property acquired by LA FOURNÉE DORÉE constitute a fundamental resource that the managers, employees and other recipients to whom the Code of Ethics is addressed must protect. The untimely disclosure of this know-how and intellectual property is likely to result in damage to LA FOURNÉE DORÉE, both in terms of its assets and its image. Consequently, all managers, employees, and other recipients to whom the Code of Ethics is addressed are obliged not to reveal to third parties information concerning the technical, technological and commercial knowledge of LA FOURNÉE DORÉE, nor other non-public information relating to LA FOURNÉE DORÉE, except in cases where such disclosure is required by law or by other regulatory provisions.

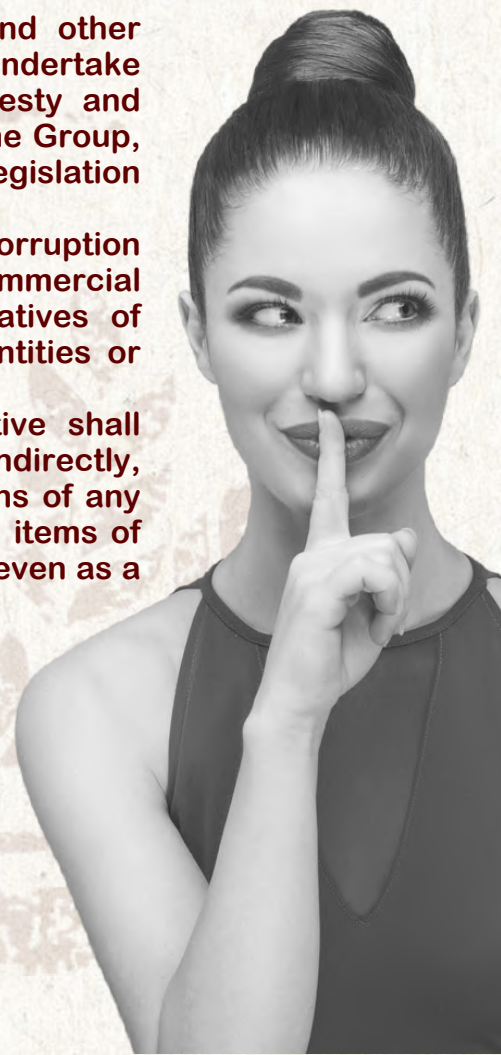
The confidentiality obligations have also been formalised contractually and also remain after the termination of the employment contract.

### CORRUPTION AND ILLICIT PAYMENTS

LA FOURNÉE DORÉE, its managers, employees and other recipients to whom the Code of Ethics is addressed undertake to respect the highest standards of integrity, honesty and correctness in all their relations inside and outside the Group, in accordance with national and international legislation against corruption (OECD guidelines).

LA FOURNÉE DORÉE does not tolerate any type of corruption (acceptance or offer of money to obtain an undue commercial advantage) involving public officials, or representatives of international organisations, or in relation to legal entities or individuals.

No officer, other employee, agent, or representative shall accept, solicit, offer or pay, whether directly or indirectly, money or other benefits (including gifts and donations of any kind, except for internationally accepted commercial items of modest economic value permitted by applicable law) even as a result of unlawful pressure.





## CONDUCT OF BUSINESS



### PREVENTION OF MONEY LAUNDERING

LA FOURNÉE DORÉE and its managers and other employees shall not engage in, or be involved in, activities involving the laundering (i.e., acceptance or processing) of proceeds from criminal activities in any manner whatsoever. Before entering a business relationship with a third party, LA FOURNÉE DORÉE and its managers or employees must check the available information (including financial information) on potential business partners and suppliers, in order to ensure their respectability and the legitimate nature of their activities.

### COMPETITION

LA FOURNÉE DORÉE recognises the fundamental importance of a competitive marketplace and is committed to full compliance with competition and other consumer protection laws. LA FOURNÉE DORÉE and its managers and other employees renounce practices (such as the creation of cartels, the division of markets, restrictions on production or sales, conditional agreements, etc.) that could represent a violation of competition laws. In the context of fair competition, LA FOURNÉE DORÉE will not knowingly violate the intellectual property rights of third parties.

Companies and individuals that violate the rules on free competition risk serious sanctions.

Furthermore, compliance with competition laws is essential to safeguard the reputation of LA FOURNÉE DORÉE.

### CONFIDENTIALITY OF PERSONAL DATA

In the course of its business, LA FOURNÉE DORÉE collects a significant amount of personal data and confidential information, which it undertakes to treat in accordance with the laws in force in the jurisdictions in which it operates and by observing the best practices for protecting confidentiality. To this end, LA FOURNÉE DORÉE ensures a high level of security in the selection and use of its own IT systems for processing personal data and confidential information.





## EMPLOYEES

LA FOURNÉE DORÉE recognises that the motivation and professionalism of its staff is an essential factor in maintaining its competitiveness, creating value for its stakeholders, and ensuring customer satisfaction. The following principles, in accordance with national laws, the Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation (ILO), confirm the importance of respect for the individual, ensure equal treatment and exclude all forms of discrimination. LA FOURNÉE DORÉE promotes the protection of fundamental human rights.

### UNDERAGE AND FORCED LABOUR

LA FOURNÉE DORÉE does not use any form of forced or compulsory labour and does not employ persons under the age set for joining the workforce by legislation in force in the place where the work is carried out, and in all circumstances, under the age of sixteen. LA FOURNÉE DORÉE also undertakes not to establish or maintain business relations with suppliers who employ underage workers as defined above.

### FREEDOM OF ASSOCIATION

LA FOURNÉE DORÉE employees are free to join a trade union in accordance with local legislation and the rules of the various trade union organisations. LA FOURNÉE DORÉE recognises and respects the right of its employees to be represented by trade unions or other elected representatives in accordance with applicable local law and practice. When LA FOURNÉE DORÉE engages in negotiations with such representatives, its actions and conduct are aimed at establishing a constructive approach and relationship.

### EQUAL OPPORTUNITIES

LA FOURNÉE DORÉE is committed to guaranteeing equal opportunities in the workplace and in career advancement for all its employees.

The head of each department ensures that in all aspects of the employment contract such as hiring, training, compensation, promotion, transfer and termination, employees are treated according to their skills and abilities, avoiding all forms of discrimination, including race, sex, sexual preference, social and personal status, physical condition and health, disability, age, nationality, religion, and personal beliefs.





## **EMPLOYEES**

### **HARASSMENT**

LA FOURNÉE DORÉE considers unacceptable any type of harassment or unwanted behaviour, such as that related to race, gender, or other personal characteristics, which is intended to undermine the dignity of the person subjected to such harassment or behaviour, both inside and outside the workplace.

### **WORKING ENVIRONMENT**

All employees should strive to maintain a neat and friendly working environment where the dignity of everyone is respected.

In particular, all employees of LA FOURNÉE DORÉE:

- must not work under the influence of alcohol or drugs;
- should, in places where smoking is not prohibited by law, be sensitive to the situation of those who may experience physical discomfort from the effects of "passive smoking" in the workplace;
- should avoid behaviour that may create an intimidating or aggressive climate towards colleagues or subordinates with the aim of marginalising or discrediting them in the workplace.

### **COMPENSATION AND WORKING HOURS**

Compensation and benefits granted to LA FOURNÉE DORÉE employees are in line with established legal requirements at the very least.

With regard to working hours and paid holidays, LA FOURNÉE DORÉE complies with the local legislation and practices of the country in which it operates.

### **HIRING AND PROMOTION**

Employees of LA FOURNÉE DORÉE are prohibited from accepting or soliciting payments of money or goods, benefits or services that may be intended to promote the hiring, transfer or promotion of an individual as an employee.



## **EMPLOYEES**



### **INTERNAL CONTROL SYSTEM, COMPANY INFORMATION AND BOOKS OF ACCOUNTS**

All managers and other employees of LA FOURNÉE DORÉE are required to maintain effective internal control systems. This includes keeping accurate and complete internal records of all company activities and ensuring that transactions and contractual commitments have been duly authorised by the relevant line manager. In addition, business expenses must be recorded accurately and in a timely manner.

### **COMPANY PROPERTY**

All LA FOURNÉE DORÉE managers and other employees must use company property and resources to which they have access, or which are entrusted to them efficiently, exclusively for the purpose of achieving LA FOURNÉE DORÉE's business objectives and purposes; they are also required to use them in a way that protects their value. In addition, all managers and other employees of LA FOURNÉE DORÉE are responsible for protecting these assets and resources from loss, theft and unauthorised use or disposal. Any use of these goods and resources that is contrary to the interests of LA FOURNÉE DORÉE or that is dictated by professional motives unrelated to the working relationship with LA FOURNÉE DORÉE is forbidden. All managers and other employees of LA FOURNÉE DORÉE are required to comply with the group's IT charter with regard to the use, access and security of software and other IT systems, emails, the Internet and the intranet portal.

### **EXTERNAL ACTIVITIES**

The managers and other employees of LA FOURNÉE DORÉE may not serve on the boards of directors of other companies without the authorisation of LA FOURNÉE DORÉE and may not engage in regular business activities that interfere with their obligations to the Group. All employment contracts of managers or other employees of LA FOURNÉE DORÉE with business partners of the Group or competitors, or the provision of services to the latter, require the prior written authorisation of the line manager concerned.



## EMPLOYEES



### OBLIGATIONS

The Code of Ethics is an integral part of the employment contract of each manager or other employee of LA FOURNÉE DORÉE. Consequently, LA FOURNÉE DORÉE requires all managers and other employees to comply strictly with the provisions of the Code of Ethics.

Managers and other employees are thus required to:

- read and understand the Code of Ethics;
- adopt actions and behaviours consistent with the Code of Ethics and refrain from any conduct likely to harm LA FOURNÉE DORÉE or to compromise its honesty, impartiality or reputation;
- report promptly and in good faith any violations of the Code of Ethics;
- comply with all internal provisions aimed at ensuring compliance with the Code of Ethics or identifying possible violations of it;
- consult the HR Department for clarification on the interpretation of the Code of Ethics;
- cooperate fully with any investigations into violations of the Code of Ethics, while maintaining absolute discretion regarding the existence of such investigations, and to participate actively, where appropriate, in audit operations on the functioning of the Code of Ethics.

### EMPLOYEES IN POSITIONS OF RESPONSIBILITY

All LA FOURNÉE DORÉE employees in a position of authority must set an example and foster a positive climate among employees, encouraging a transparent exchange of ideas and providing leadership and guidance in accordance with the principles of business conduct contained in the Code of Ethics. All line managers must report all cases of non-compliance with the Code of Ethics and are responsible for ensuring the protection of those who have reported violations of the Code of Ethics in good faith, as well as for forwarding the information to the Human Resources Department to assess the degree of sanction applicable to the violation.



## HEALTH, SAFETY AND ENVIRONMENT



### HEALTH AND SAFETY IN THE WORKPLACE

LA FOURNÉE DORÉE recognises health and safety in the workplace as a fundamental right of employees and a key part of the Group's sustainable development.

All decisions made by LA FOURNÉE DORÉE must respect health and safety in the workplace. LA FOURNÉE DORÉE adopt an effective workplace health and safety policy, based on preventive measures, both individual and collective, to minimise the potential risks of harm in the workplace.

LA FOURNÉE DORÉE aims to provide excellent working conditions, based on the principles of hygiene, ergonomics, and organisational and operational processes. LA FOURNÉE DORÉE believes in and actively promotes a culture of accident prevention and risk awareness among workers, by especially providing training and information on the subject.

Employees must consider themselves personally responsible and adopt the preventive measures established by LA FOURNÉE DORÉE for the protection of their health and safety, communicated by means of guidelines, instructions, training, and specific information. All employees are responsible for the proper management of safety and must not expose themselves or other workers to hazards that may cause harm or damage.

### ENVIRONMENTAL PROTECTION IN WORK PROCESSES

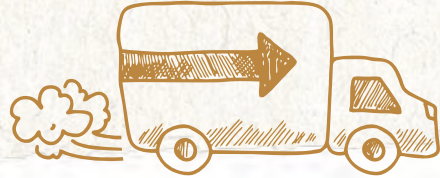
LA FOURNÉE DORÉE considers environmental protection to be a decisive factor to take into account in the management of the company's activities. LA FOURNÉE DORÉE is committed to continuously improving the environmental performance of its production processes and to meeting all major legislative and regulatory requirements in this area. This includes the development and extension of an effective and certified Environmental Management System based on the fundamental principles of minimising environmental impact and making optimal use of resources.

LA FOURNÉE DORÉE relies on its employees to play an active role in the application of these principles in their professional activities.





## EXTERNAL RELATIONS



LA FOURNÉE DORÉE and its employees are obliged to maintain and develop their relations with all categories of stakeholders in good faith, with loyalty, propriety, transparency and with all due respect for the fundamental values of LA FOURNÉE DORÉE.

### CUSTOMERS

LA FOURNÉE DORÉE aims to fully satisfy the expectations of the end customer. All managers and other employees are expected to act in a way that meets customer expectations and continuously improves the quality of the Group's services.

For LA FOURNÉE DORÉE, it is fundamental that its customers are treated properly and honestly. It therefore requires managers, employees, and other addressees of the Code of Ethics to ensure that all relationships and contacts with customers are based on honesty, professional propriety, and transparency.

Employees must follow internal procedures designed to achieve this objective through the development and maintenance of beneficial and lasting relationships with customers, offering them security, support, quality and value, supported by continuous innovation. In their relations with customers, LA FOURNÉE DORÉE companies must not engage in discriminatory behaviour in their negotiations with them and must not misuse their negotiating power.

### SUPPLIERS

Suppliers play a fundamental role in improving the overall structural competitiveness of LA FOURNÉE DORÉE.

All LA FOURNÉE DORÉE managers and other employees are encouraged to establish and maintain stable, transparent and cooperative relationships with suppliers.

In order to consistently ensure the highest level of customer satisfaction, the Group selects suppliers according to appropriate and objective methods that take into consideration not only quality, innovation, costs and services offered, but also social and environmental performance and the values set out in the Code of Ethics.

In this respect, and as a member of the SEDEX reference system, LA FOURNÉE DORÉE ensures that its suppliers validate and respect the commitments of the SMETA code of conduct.



## EXTERNAL RELATIONS

### PUBLIC INSTITUTIONS

Relations with public institutions should only be handled by departments and employees who have been delegated these functions. All these relationships must be conducted in a transparent manner in accordance with the values of LA FOURNÉE DORÉE.

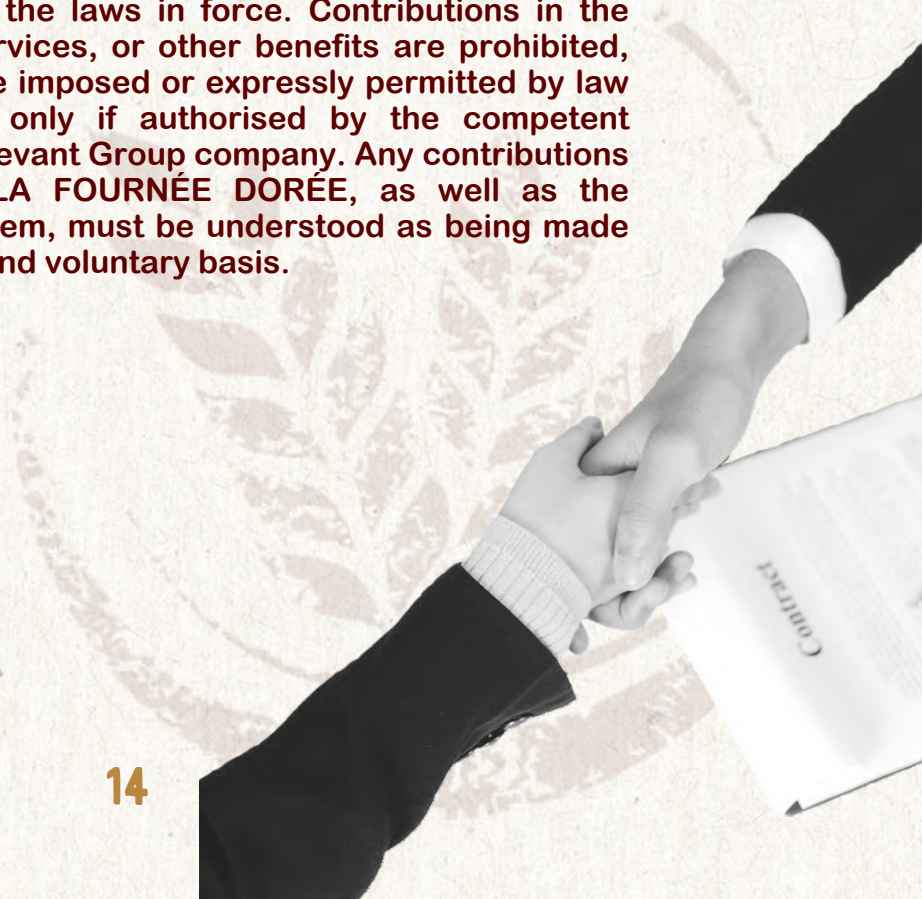
Gifts and courtesies (where permitted by law) to representatives of public institutions should be of modest and appropriate value and should in no way be construed as seeking or attempting to gain undue advantage.

The Group acts in full cooperation with official and governmental bodies within the scope of their legitimate activities. LA FOURNÉE DORÉE will cooperate fully in the event that one or more of its companies is subject to legitimate inspections by public authorities.

If a public institution is a client or supplier of a company of LA FOURNÉE DORÉE, the latter must act in strict compliance with the laws and regulations applicable to the acquisition or sale of goods and/or services by the public institution concerned.

### TRADE UNIONS AND POLITICAL PARTIES

All relations between LA FOURNÉE DORÉE and trade unions, political parties and their representatives or candidates must adhere to the highest principles of transparency and propriety and must comply strictly with the laws in force. Contributions in the form of money, goods, services, or other benefits are prohibited, with the exception of those imposed or expressly permitted by law and, in the latter case, only if authorised by the competent corporate bodies of the relevant Group company. Any contributions made by employees of LA FOURNÉE DORÉE, as well as the activities carried out by them, must be understood as being made exclusively on a personal and voluntary basis.





## EXTERNAL RELATIONS

### CORPORATE COMMUNICATION AND INFORMATION

LA FOURNÉE DORÉE recognises the importance of clear and effective communication in internal and external relations, ensuring the highest standards of financial and non-financial reporting, in order to provide a clear and transparent picture of its economic, social and environmental performance. Employees of LA FOURNÉE DORÉE who are responsible for disclosing information about LA FOURNÉE DORÉE to the public in the form of speeches, participation in events, publications or any other form of presentation must comply with the provisions laid down by LA FOURNÉE DORÉE and receive prior approval from the department responsible for this, if necessary.

Communications to economic and financial markets and supervisory bodies must always be provided in a timely, accurate, complete, correct and understandable manner and, in any event, in accordance with the laws applicable in the relevant jurisdictions. This form of communication must be managed exclusively by employees specially invested with the responsibility of communicating to the economic and financial markets and to the supervisory authorities, as well as in strict compliance with the Code of Ethics and the rules in force within LA FOURNÉE DORÉE.



### MEDIA RELATIONS

Communication with the media plays an important role in the formation of LA FOURNÉE DORÉE's image; therefore, all information about LA FOURNÉE DORÉE must be provided in a truthful and uniform manner, and only by those responsible for and employed in relations with the media, in strict compliance with the rules laid down by LA FOURNÉE DORÉE. All other managers or employees must refrain from providing media representatives with information about LA FOURNÉE DORÉE that is not in the public domain, and must not have any type of contact with them that is intended to disseminate confidential information about the company; they must, however, take care to pass on any questions asked by the media to the competent person or department.



## ACCOUNTING AND INTERNAL CONTROL

LA FOURNÉE DORÉE adopts high standards of financial planning and control as well as consistent accounting systems that are adapted to the accounting principles applicable to LA FOURNÉE DORÉE companies and comply with legislation in force.

In carrying out this practice, LA FOURNÉE DORÉE operates with the utmost transparency, in a manner consistent with the best business practices, with the aim of:

- ensuring that all transactions are properly authorised, verifiable and legitimate;
- ensuring that all transactions are executed promptly, properly recorded, accounted for and timely documented in accordance with applicable accounting principles;
- ensuring propriety and full transparency in the management of related party transactions;
- preparing timely, complete, accurate, reliable, clear, and understandable periodic financial reports;
- identifying, analysing, and managing with professional diligence the business risks associated with all of LA FOURNÉE DORÉE's activities;
- instituting rigorous business procedures to ensure that management decisions (including investment and divestment decisions) are based on sound economic analyses that take into account a prudent assessment of risk and provide assurance that the company's assets are used to best effect;
- ensuring that decisions on financial, tax and accounting issues are taken at an appropriate management level and in full compliance with applicable laws;
- preparing in a timely manner the documents to be sent to the market supervisory authorities or to be disseminated to the public, and ensuring that these documents are complete, accurate, reliable, clear and understandable.



## ACCOUNTING AND INTERNAL CONTROL

LA FOURNÉE DORÉE recognises the primary importance of internal controls to good management and success. LA FOURNÉE DORÉE considers transparency in the way the various operations are recorded to be of fundamental importance to its success. Consequently, LA FOURNÉE DORÉE requires all employees to provide accurate, timely and detailed reports on financial and other business transactions. Employees must keep true and accurate records of all financial and other business transactions, together with the necessary supporting documentation. Irregular bookkeeping is a violation of the Code of Ethics and is considered unlawful in almost all legal systems.

All employees are therefore prohibited from engaging in conduct or making omissions that may lead to inaccurate or incomplete information, including:

- recording fictitious transactions;
- recording incorrect or inadequately documented transactions;

All managers and other employees who are required to assist in the preparation and presentation of documents to the supervisory authorities or the public shall ensure, insofar as is within their competence, that such documents are complete, accurate, reliable, clear and understandable.





## IMPLEMENTATION AND PROTECTION

LA FOURNÉE DORÉE is committed to achieving the highest standards of excellence in its moral, social and business responsibilities to its stakeholders. The Code of Ethics defines the expectations of LA FOURNÉE DORÉE with regard to managers and other employees as well as third parties with whom it has business relations, and the responsibility they must assume in order to put these policies into practice. The managers of the various departments of LA FOURNÉE DORÉE are responsible for ensuring that these expectations are understood and put into practice by employees. Managers must ensure that the commitments expressed in the Code of Ethics are implemented.

LA FOURNÉE DORÉE encourages employees to contact the relevant Human Resources Department in any situation where they may be in doubt as to the appropriate behaviour.

All requests for clarification will be answered promptly, without any risk of the employee suffering any form of retaliation, even indirectly.

Any violation of this charter should be reported by contacting the human resources department or by using the confidential reporting procedure, available on the intranet, company computer workstations and compulsory notices.

Any sanctions for violations of the Code of Ethics, proportionate to the violation identified, are adopted by line managers, after obtaining the opinion of the Human Resources Department, in accordance with the regulations in force and the collective agreements or company agreements.

Any form of retaliation against those who have reported in good faith possible violations of the Code of Ethics or who have asked for clarification of the application of the Code of Ethics constitutes a violation of the Code of Ethics, as does the behaviour of anyone who has voluntarily accused other employees of violating this Code without foundation.

*Vanina MORILLON*

General Director

V3 - 25/11/2024