

Typical family-owned company, S.T.T.S aims to improve people's quality of life and safeguard current and future generations livelihoods by acting in an economically, ecologically and socially responsible manner while providing high value-added products and services.

Our employees (also referred to as "employees" or "staff members" later) play a significant role in achieving this goal. In this regard, the sharing of ethical values and environmentally friendly practices are among the pillars of the relationship between them and society. This requires taking into account the values, commitments and needs of each person.

The requirements and principles of this Code of Ethics are an integral part of the contractual obligations and the collaboration between S.T.T.S and its employees. The latter therefore undertake to respect and promote the principles of this charter.

The content of this policy shall also apply in its entirety to third parties used by employees to perform any contract with S.T.T.S. We ask them to do their best to compel third parties to do the same.

The terms "we", "us", "S.T.T.S", "company" will be used to underline the inclusive nature of such a document.

## **QUALITY**

S.T.T.S ensures that quality is and will remain at the heart of its business. We are committed to continuous improvement by working together and complying with the processes agreed upon within the company. S.T.T.S also requires that its employees show a commitment to quality and comply with its collective requirements as well as any other specific individual requirements. We encourage our employees to work with S.T.T.S in an open and collaborative manner to ensure the continuous improvement of our business.

## **PRINCIPLE OF LEGALITY**

S.T.T.S respects the principle of strict legality in its activities, measures and contracts and requires its employees to follow the same principle. This includes respecting the rights of all workers, prohibiting corruption and money laundering, complying with local, national, international and export laws and regulations, and not infringing on the legal rights of third parties as well as social protection laws and environmental standards.

## **REPORTING VIOLATIONS**

Any person, internal or external to STTS, who is aware of a possible violation of our charter or a violation of the various applicable regulations, must report this violation.

The report can be made through channels that will guarantee, among other things, the anonymity of the whistleblower, the confidentiality of exchanges and the absence of any reprisals. These channels of communication may be the immediate supervisor, the human resources manager, management, a trade union, staff representatives or any other channel that the person deems most appropriate.

## **WORKERS' RIGHTS**

S.T.T.S shares the principles set out in:

- The International Bill of Human Rights.
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)

### **HUMAN RIGHTS**

We call on our employees to consistently respect internationally recognized human rights and their active contribution to their protection, in accordance with the United Nations Guiding Principles on Business and Human Rights. This includes the preservation of local communities, the protection of indigenous peoples and support for human rights defenders.

In the event of a breach of these commitments, the Company will take appropriate measures to remedy it, including correcting the affected situations and implementing preventive measures to prevent any recurrence. The company may also offer awareness-raising or training actions to strengthen its employees' knowledge of and respect for human rights.

### **CHILD LABOUR**

S.T.T.S. undertakes to employ only persons who have reached the age of 15 (or 14 if permitted by national legislation), the age of completion of compulsory schooling or the minimum legal age for work according to local legislation, whichever is the most demanding. No form of child labour is tolerated, in particular the worst forms of child labour as defined by the International Labour Organisation (forced labour, hazardous labour, sexual exploitation, trafficking, slavery, servitude, etc.). The company makes sure to verify the age of employees at each time they are hired to prevent any violations.

In the context of student internships in a professional environment linked to official training, S.T.T.S. undertakes not to entrust any work likely to compromise the health, safety or physical or moral integrity of persons under 18 years of age. The society also ensures respect for the dignity and rights of children in all its activities.

Each employee is required to immediately report any breach of these principles in order to ensure that they are strictly respected.

### **FORCED LABOUR**

S.T.T.S. and its partners strictly reject all forms of forced labor, including human trafficking, torture, slavery, or any imposed forced labor. Work must be freely chosen, and employees retain the freedom to terminate their contracts without financial loss, in accordance with local law. All contractual documents, including the employment contract and job description, must be provided in a language that the employee can understand and clearly detail their tasks, responsibilities and working conditions. Any change in position or function must be discussed and accepted with the employee. Identity documents and other official papers should never be confiscated or unjustifiably withheld, although verification may be carried out upon hiring or re-clearance. Finally, S.T.T.S. and its partners ensure that workers can move freely, without unreasonable restrictions or pressures, both in and out of the workplace.

### **RECRUITMENT AND TRAINING FEES**

STTS undertakes not to invoice employees and future employees for the costs inherent in their recruitment and professional training.

### **FREEDOM OF ASSOCIATION**

The fundamental right of employees to form and join trade unions, on their own initiative, must be respected within our society. Members of a trade union or staff delegates must not constitute a ground for unjustified discrimination. The right to collective bargaining for the settlement of internal disputes, for working conditions and the right to strike must be granted within the framework of the legal provisions.

### **EQUAL OPPORTUNITIES AND FAIR TREATMENT**

We are committed to excluding discrimination based on skin colour, ethnic origin, gender, age, nationality, social background, illness, sexual orientation, religious affiliation, beliefs or trade union or political activities. This commitment also covers any form of harassment or psychological abuse. On the basis of comparable requirements and tasks, the principle of equal pay for work of equal value applies regardless of gender.

These principles are integrated into all decision-making processes, including recruitment, training, career development, the choice of partners and service providers, as well as in all company projects and actions.

In addition, STTS undertakes, within the limits of its means and in accordance with local regulations, to put in place, with the support of the competent authorities, if necessary, the appropriate adaptations to enable employees with specific needs to work in adapted conditions. This may include, for example, changing the workstation, flexible schedules or specific tools, in order to promote equal opportunities, inclusion and the well-being of each employee.

### **FAIR WORKING CONDITIONS**

STTS is committed to strengthening the right to fair working conditions. This includes a living wage and social benefits equivalent to or higher than the rates prescribed by regional or national authorities, legislative standards, or other labor agreements. To allow easy management of the family budget, the company undertakes to pay salaries on a fixed date and to notify employees in the event of a delay in payments. The framework of the legal provisions of the minimum wage is observed in addition to the regulations in force on working hours, breaks, paid holidays, paid sick days, family and medical leave.

As a reward for employees' efforts to support the company, STTS pays a portion of the profits in premiums and payments via complementary health insurance, pensions, insurance, and other schemes. The list is available from the administrative department.

### **HEALTH AND SAFETY**

STTS establishes a system to prevent risks related to the safety and health of employees and third parties. This system defines the requirements for assessing risks at work, the controls to eliminate or reduce these risks, the appropriate instructions and the training for those who may be impacted. The company must also comply with national occupational health and safety standards and commit to meeting health and safety requirements to ensure good working conditions.

This includes the possession and use of illicit substances and materials (drugs, alcohol, weapons, ...). The use of illegal substances (other than on medical prescription) is not tolerated on the company's properties.

At a minimum, we require our employees to report any new risks or changes in existing risks; to implement and comply with the instructions established by the members of the staff competent in the field.

### **PROTECTION FROM EVICTION AND LAND DEPRIVATION**

STTS undertakes to refrain from any illegal evictions, illegal deprivation of land, forests and waters through acquisition, development or any other use resulting therefrom.

### **USE OF PUBLIC OR PRIVATE SECURITY FORCES**

We refrain from hiring or using private or public security personnel, if due to the lack of instructions or control on the part of the company, there is a risk of derogating from the prohibition of torture and

cruel, inhuman or degrading treatment, danger of death or injury or risk of infringing the freedom of association.

#### **PRIVATE DATA AND DATA SECURITY**

The Company undertakes to collect and process only the personal data that is strictly necessary for the performance of its activities, the operation of its services, and the provision of adequate means for the performance of the employee's duties. Any collection or sharing of personal data will be the subject, when required by regulation, of a request for prior, free, specific and informed consent from the person concerned.

The Company applies the principle of the right to informational self-determination, guarantees the confidentiality and integrity of personal data, and implements all appropriate technical and organizational measures to ensure the security of commercial information and personal data processed in the context of its business, administrative or other processes. Partners, service providers and subcontractors acting on behalf of the Company are required to comply with the same security and confidentiality standards, and must take all necessary measures to ensure adequate protection of the data and documents entrusted to them. Where necessary, the Company may use confidentiality agreements (NDAs) or non-disclosure agreements to ensure the protection of sensitive information.

Employees who have access to confidential information in the course of their duties are subject to a strict obligation of confidentiality and may only use this information for legitimate, professional and duly authorised purposes. Employees, as well as any third party authorised in accordance with the legal and regulatory provisions, have a right of access to their personal data as well as a right to rectification, erasure, limitation of processing, opposition and portability, in accordance with the applicable regulations.

In compliance with the legislation in force, the Company reserves a proportionate and justified right of control over the resources, goods and professional data that it makes available. As such, and when necessary to prevent abuse, to protect the legitimate interests of the Company or to ensure the safety of its working environment, it may access, in particular, computer and voice files, commercial documents, as well as professional premises and storage spaces, including offices and cloakrooms, belonging to S.T.T.S., subject to respect for the rights of individuals.

The Company retains personal data for the period strictly necessary to achieve the purposes for which it was collected, for the duration of the employment contract, or for a longer period when required by legal, regulatory or contractual obligations. Upon expiry of these periods, the data will be deleted, anonymised or destroyed in a secure manner, in accordance with the applicable standards and contractual commitments.

## **REPRESENTATIONS AND RELATIONSHIP**

#### **SUPPORT AND REPRESENTATION**

As the company's representative to the various stakeholders, employees must act legally, with honesty, integrity and transparency in all dealings with governments, their agencies and representatives.

Their clothing, body language and oral language must be appropriate to the events and people related to this event. However, due to the company's activity, clothing related to the safety and health of the employee must be worn as a priority.

#### **COMMUNICATION WITH THE OUTSIDE WORLD**

In the event that it is necessary to communicate with the public, partners or authorities, the company has put in place procedures to guarantee consistency in terms of image and messages disseminated. Employees are required to comply with these procedures and to inform management in advance so that the latter can put in place the means it deems necessary.

## **MISUSE OF COMPANY ASSETS**

Our employees are not permitted to use the company's products, contacts, property, and property for their personal purposes. However, the management is aware of the difficulties that an employee may encounter in managing private events and grants itself the right to authorize an employee to use products belonging to the company after having been consulted. This includes, for example, the company's vehicles, tools, the communications network (telephones, emails, internet, etc.).

## **CONFLICTS OF INTEREST**

We ask our employees to make decisions based on objective considerations and cannot be guided inappropriately by self-interest. An employee who becomes aware of a potential conflict of interest must inform the hierarchy so that the latter can take the necessary internal measures to remedy this conflict and immediately inform the management.

## **FREE COMPETITION**

We strictly adhere to the rules of fair competition and comply with all applicable regulations. Our employees must refrain from: entering into agreements restricting competition, abusing dominant positions, carrying out mergers or acquisitions that significantly reduce competition, or participating in illegal boycotts.

Any suspicion of infringement of the competition rules must be reported immediately in order to allow for appropriate intervention. The company may also organise, if necessary, awareness-raising or training actions to strengthen knowledge of and compliance with competition obligations.

## **CORRUPTION**

Our employees are committed to strictly complying with anti-corruption laws. They must ensure that their contacts (employees, suppliers, customers, service providers) do not offer, promise or grant benefits to S.T.T.S. associates in order to obtain a contract or any preferential treatment. Business partners may only offer gifts or hospitality in a frank and transparent manner; It must not in any way intend, or be construed as intending, to inappropriately influence business decisions.

The same rule applies to agreements entered into with a third party in the context of any contract with the company.

Failure to comply with these obligations may result in disciplinary consequences, up to and including dismissal, as well as legal sanctions in accordance with the regulations in force. In order to strengthen understanding and compliance with these rules, S.T.T.S. may offer training and awareness-raising actions for its employees.

In addition, S.T.T.S. will pay reasonable and duly justified professional expenses, such as audit, travel or other expenses necessary for the exercise of the company's activities, in order to avoid any situation that could be interpreted as an undue advantage or a form of corruption.

## **MONEY LAUNDERING**

Employees are required to comply with laws preventing money laundering and to duly fulfil their obligations in relation to it.

## **CUSTOMS AND EXPORT CONTROL REGULATIONS**

The company is committed to complying with international customs systems and export control regulations, and to proactively sharing any foreign trade information that helps secure the supply chain.

## **CONFLICT MINERALS**

S.T.T.S supports the objective of the regulations regarding the supply and use of "conflict minerals". We support an end to violence and an end to human rights violations in mining operations in areas described as Conflict and High-Risk Areas (CAHRAs).

S.T.T.S does not, in fact, source specific metals from these conflict regions, and we expect our employees and suppliers to conduct due diligence on their supply chains to ensure compliance with this request. In addition, every year, suppliers will have to submit to S.T.T.S a new CMRT declaration and ancillary versions (known as extended or "EMRT" or other) confirming compliance with this rule. We call on our staff members and economic partners to refrain from any activity that contributes directly or indirectly to the formation of armed groups. To this end, they must comply with the S.T.T.S. policy regarding the purchase of raw materials in so-called conflict zones and comply with the applicable regulatory provisions.

#### **CUSTOMS AND EXPORT CONTROL REGULATIONS**

Aware of the risks associated with the use of counterfeit products, the company is committed to detecting and prohibiting the use of counterfeit products within its organization. We are aware of the difficulty of controlling every material, product and equipment that arrives in the company. This is why each employee is asked to check at least the documents (certificates, delivery notes, etc.) and packaging (sealing, labels, etc.) and report any doubts about the origin of the product.

## **ENVIRONMENTAL STANDARDS**

#### **ENVIRONMENTAL PROTECTION**

In accordance with the precautionary principle, the company is committed to making every effort to minimize risks to people and the environment, and to protect natural resources. To this end, it has put in place an appropriate and effective environmental management system, which includes the assessment of environmental risk, the implementation of controls to eliminate or reduce these risks and the dissemination of information to those who may be impacted.

All processes, operating sites and production resources used by our partners must meet regulatory and normative requirements for the protection of the environment.

#### **CLIMATE ACTION**

S.T.T.S is committed to active and sustainable climate action, for example, by improving energy efficiency, or by producing or using energy from renewable sources. Approaches are put in place to assess and reduce carbon emissions and the consumption of natural resources such as water, rare earths, etc.

#### **WATER CONSUMPTION AND QUALITY**

We are committed to using water diligently. In regions or periods where water is scarce, access to drinking water, its consumption and sanitation will have to be done in a reasonable way. The company is committed to meeting wastewater quality standards and related regulations.

#### **AIR AND SOIL QUALITY**

Materials, products and articles must be reused as far as possible. Each employee is part of an active approach to reduce waste, recover and recycle if possible and finally to throw away only as a last resort.

To minimize the impact on the environment, the company disposes of materials and waste in accordance with the applicable legal provisions and according to the requirements of the legal authorities.

Procedures and monitoring resources are put in place to optimize the effectiveness of this approach.

#### **SUBSTANCES OF CONCERN**

We are committed to a process of substituting and eliminating substances of concern from products supplied to employees, third parties, suppliers and customers. In doing so, we ensure compliance

with compliance rules, such as legal bans on substances, restrictions, reporting requirements and any applicable standards. This means respecting the ban on the use of mercury or its derivatives in manufacturing processes or waste treatment.

## **REPORTING VIOLATIONS**

### **DUTY TO REPORT**

All employees and parties involved are encouraged to report any suspicious cases or violations of internal policy. This is to mitigate the consequences of such violations and prevent similar behaviour in the future.

S.T.T.S. undertakes to put in place all necessary means to enable its employees to report any concern, irregularity or violation of this code in complete safety and without fear of reprisals. All information received will be treated and stored in the strictest confidence, and the protection of the identity of persons reporting facts will be strictly guaranteed.

The company may also, if necessary, provide awareness-raising and training actions to inform employees about how to report, their role and the importance of contributing to the prevention of reprehensible behaviour.

### **CRISIS MANAGEMENT**

If an incident, event or grievance related to corporate social responsibility occurs, notification to S.T.T.S. is expected. The means of communication will be at the discretion of the notifier to guarantee confidentiality and trust.

An analysis of the root causes will have to be made, and proposals and actions put in place to remedy this state.

### **MONITORING**

The Company reserves the right to send self-assessment questionnaires; conduct on-site visits or commission authorized and independent third parties to audit its employees on behalf of S.T.T.S. to verify compliance with the minimum standards described in this document.

If audits are necessary, the employee will be informed sufficiently in advance and S.T.T.S. undertakes to ensure that the said audit remains within the defined framework.

### **CLAUSE DE REPERCUSSION**

Failure to comply with this code may have a negative impact on S.T.T.S. or on the relationship with the employee. S.T.T.S. reserves the right to reassess its position with any employee who has violated this charter.