



CODE OF CONDUCT

Petit Forestier Group Companies
January 2024

TEN COMMITMENTS

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EDITORIAL

The Petit Forestier Group remains faithful and committed to its long-standing culture of upholding ethical, social and environmental standards.

This Code of Conduct gives shape to this commitment and aims to promote a culture of compliance and transparency to protect the interests, reputation and image of the Group and its subsidiaries in France and abroad.

The principles covered in this Code are relevant to all of us, whatever our position or place of work. The Group will not tolerate any form of corruption and expects all its employees, suppliers, clients and intermediaries to behave with integrity, and in compliance with laws and regulations.

This code of conduct constitutes the underlying framework to which our employees should refer to adopt ethical and responsible behaviours at work.

I am therefore counting on every one of you to ensure that all the principles set out in this Code are applied, so that we develop our activities in a way that is ethical and safe. In this way, we can become the world leader in sustainable refrigeration rentals.

Léonard Forestier
Chairman of the Executive
Board

I. The ten Group commitments



1

FIGHTING CORRUPTION

The Group has a zero-tolerance policy on corruption and takes every necessary measure to prevent influence peddling and conflicts of interest.



2

FIGHTING ANTI-COMPETITIVE PRACTICES

The group is committed to fair competition and does not tolerate anti-competitive practices in any shape or form.



3

FIGHTING MONEY LAUNDERING AND FINANCING OF TERRORISM

The Group puts in place measures to fight against money laundering and the financing of terrorism through procedures to identify and verify its clients and partners.



4

GROUP VIGILANCE WITH REGARD TO ITS RELATIONSHIPS

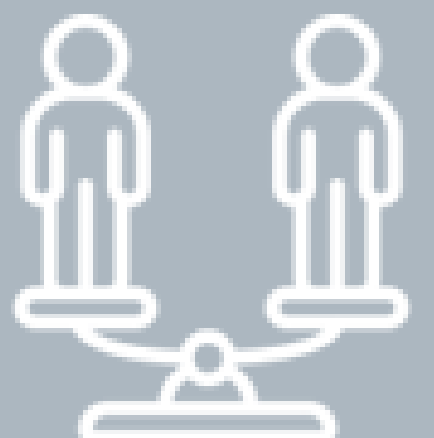
The Group has put in place measures for assessing the third parties and stakeholders with which it does business. It also requires its suppliers to commit to respecting these ethical, social and environmental values.



5

RESPECT FOR HUMAN RIGHTS

The Group is committed to respecting and promoting human rights, which are one of the cornerstones of its corporate social responsibility policies.



6

PROTECTING PERSONAL HEALTH AND SAFETY

The group is committed to guaranteeing all its employees and external partners a healthy, safe work environment by identifying and minimising risks linked to activities.



7

PREVENTING DISCRIMINATION AND HARASSMENT

The Group is committed to a work environment without harassment or discrimination, where every individual is treated with respect and dignity, can contribute fully and enjoys equal opportunities.



8

PERSONAL DATA PROTECTION

The protection of personal data is one of our core concerns. Our Group applies appropriate measures to protect the personal data that has been entrusted to us and to comply with the regulations that apply.



9

PROTECTING THE ENVIRONMENT

The Group is committed to minimising the direct and indirect impact of its activities on the environment and to continuously improving its environmental performance.



10

WHISTLEBLOWING SYSTEM

The Group has put in place a whistleblowing system for reporting conduct or situations that may constitute a breach of the rules that apply within the Group. This system promotes a work environment in which everyone is free to express themselves.



II. How to use the Code of Conduct



HOW TO USE THE CODE OF CONDUCT

The Petit Forestier Group has put in place this Code of Conduct to promote ethical behaviour and develop a culture of compliance. It embodies a desire within the Group to lead by example, for the sake of our reputation, to best serve the interests of our clients and to secure the trust of our stakeholders.

TO WHOM DOES THE CODE APPLY?

This code of conduct applies within all Petit Forestier Group Companies, in all the countries in which we are active.

It applies to all employees, whatever their position within the Group.

Failure to respect the rules of the Code may result in disciplinary action, in accordance with laws and regulations applicable within the company.

WHAT IS THE OBJECTIVE OF THE CODE?

The Code of Conduct has been put in place to communicate our values and rules of conduct.

Its aim is to help us to identify risky situations and to adopt the right behaviours. However, this Code is not exhaustive and does not directly address all situations. That is the reason why, in any situation, everyone should ask themselves the following questions:

THE FIVE QUESTIONS TO ASK ONESELF FOR ETHICAL BEHAVIOUR:

1. It is legal?
2. Does it comply with our values, our Code of Conduct and our procedures?
3. Is it in the interest of our clients and our stakeholders?
4. Would I be comfortable explaining my decision to a third party or if my decision was made public internally and externally (e.g. in the press)?
5. Have I taken into account all the risks and consequences for my entity or for the Group?

If the answer to any of these questions is **NO** or if unsure, check with your manager, the compliance officer or the human resources representative.

This Code of Conduct is effective from 1 January 2024

III. Code of Conduct principles



1. FIGHTING CORRUPTION

DEFINITION & PRINCIPLES

Corruption involves soliciting or accepting undue advantage (gifts, invitations, payments, donations, etc.) on the part of a person working in the private or public sector in return for acting or refraining from acting in a certain way, within the context of that person's duties.

It is important to be particularly vigilant around public officials. Public corruption is strongly suppressed in most countries around the world, and some legislations simply forbid public officials from receiving any advantage whatsoever from persons with whom they do business.

The Petit Forestier Group advocates a **zero-tolerance principle** in relation to corruption.

What I should do

- ✓ Act with professionalism, integrity and compliance with laws and regulations.
- ✓ In the event of third-party solicitation, warn my manager or the Compliance Officer. Exercise my whistleblower rights and report any situation involving corruption or influence peddling.
- ✓ Always be vigilant in my relationships with clients and suppliers.
- ✓ Respect existing procedures for validating work expenses.
- ✓ Hold meetings with public officials in the presence of two colleagues and produce written minutes of the discussions.

What I shouldn't do

- ✗ Offer or promise a third party a financial advantage or gift with the aim of persuading them to act in a certain way.
- ✗ Solicit or receive any gift or invitation in exchange for an action within the framework of my duties at work.
- ✗ Conceal a bribe through a sponsorship or patronage action.
- ✗ Make a third party cover the costs of all or part of a trip, even a work trip.

EXAMPLES OF CORRUPTION

An employee sends a valuable gift to a client during a contract negotiation or a call for bids.

A supplier offers an employee a weekend away in exchange for reducing the payment deadlines for their invoices.

A Group employee offers a bribe to a public official to change the specifications for a call for bids in the Group's favour.

2. GIFTS AND INVITATIONS

DEFINITION & PRINCIPLES

Gifts and invitations are tangible or intangible advantages offered or received within the context of a business relationship. They are a regular part of business relationships and are acceptable when their value is reasonable and are not agreed to with a view of gaining advantage for oneself or for the Group.

Depending on the country, customs may vary. It is incumbent upon employees to adapt their behaviour to respect this code and the relevant laws, according to the country.

Gifts / invitations are acceptable if:

- ✓ They have a legitimate business aim, they aim to promote the Group's name and activities and to contribute to the quality of the business relationship.
- ✓ They are not given in return for an undue advantage for the employee or the Group.
- ✓ They are reasonable and appropriate in terms of what is customary and of the recipient or giver's position within the company.
- ✓ They are made on behalf of the Group and not sent to a personal address.
- ✓ Their value is less than €100.

Gifts / invitations are not acceptable if:

- ✗ They take the form of cash.
- ✗ Their value is greater than €100. Above this threshold, contact your manager and Compliance service to determine how you should behave.
- ✗ They are sent to a personal address.
- ✗ They are agreed as part of a sales negotiation (before, during, or just after) and are likely to influence the decision.
- ✗ They are sent directly to the personal home of the beneficiary.

EXAMPLE OF GIFTS AND INVITATIONS:

An employee wants to organise a dinner or a reception for their best clients in a business context. This invitation should include business content aimed at promoting the Group's activities or products and be proportional to the sales opportunity.

A supplier sends an employee a "deli box" or a box of chocolates for the end-of-year holidays. The gift may be accepted as it is reasonable and customary. Nevertheless, it should be shared internally with the team.

If the value of the gift is significant (e.g., a box of champagne, branded leather goods, a package holiday, etc.) or does not respect the rules set out above, it must be refused. Any gift worth more than €100 must be reported to Compliance to be recorded.

3. CONFLICTS OF INTEREST

DEFINITION & PRINCIPLES

A conflict of interest refers to any situation in which the personal interests of an employee might enter into conflict with those of the Petit Forestier Group.

This situation is liable to influence the employee's judgement and thus weaken their ability to act independently, impartially and objectively while doing their job.

In the event of a conflict of interest, or in the event that an employee anticipates such a conflict of interest, they should inform their manager and take the necessary measures to remove themselves from this situation.

What I should do

✓ Immediately inform my manager of possible conflicts of interest and remove myself from discussions and the decision-making process.

✓ Notify my manager and Compliance representative if I am elected to public office (e.g. mayor, local councillor, departmental councillor, etc.).

✓ Respect the call for bids procedure, in particular in terms of listing preferred service providers and the decision-making team.

What I shouldn't do

✗ Take decisions that are influenced or altered by personal considerations or by pressure from third parties.

✗ Detain and not declare financial interests or stakes in a third party entity with commercial or financial ties to the Group.

✗ Conceal information about any conflict of interest or any situation that might give rise to a conflict of interest.

EXAMPLES OF CONFLICTS OF INTEREST:

A Group employee responsible for a call for bids must choose between three qualified entities, one of which is managed by their wife. In this case, the employee must inform their manager and recuse themselves from the decision-making process.

An employee responsible for recruitment has a family or personal tie to someone applying for a job. The employee must immediately inform their manager and recuse themselves from the recruitment process.

4. INFLUENCE PEDDLING

DEFINITION & PRINCIPLES

Influence peddling involves soliciting or granting advantages of any nature (offers, gifts, promises, etc.) on behalf of oneself or anybody else by using one's influence, real or imagined, in view of obtaining a favourable decision from a public authority or body (relating to distinctions, jobs, contracts, etc.).

The difference with corruption comes from the fact that influence peddling requires the involvement of an intermediary between the beneficiary and the public authority.

What I should do

- ✓ Be vigilant in discussions and meetings with public officials.
- ✓ Alert my manager or the Compliance officer if I come under pressure from or am solicited by a public official.
- ✓ Always ask myself how my behaviour would be perceived by a third party.
- ✓ Ensure that any payment involving a public official is correctly authorised and recorded in the company accounts.
- ✓ Report any potential breach using the internal whistleblowing system put in place by the Group.

What I shouldn't do

- ✗ Offer an advantage, whatever its value, to a public official, so that they should use their influence to favour our Group.
- ✗ Accept the offer of a public official promising to act in favour of the Group using their relations with other public officials.

EXAMPLES OF INFLUENCE PEDDLING:

A Group employee asks someone close to them, who sits on the local council, to influence the Council's decision in favour of Petit Forestier within the context of a public procurement process for renting refrigerated trucks for the municipal kitchen.

After registering our trucks with the local authorities in a country in which we do business, a government employee proposes to one of our employees that they can influence the person responsible for registration documents in exchange for payment.

5. PATRONAGE SPONSORSHIP AND DONATIONS

DEFINITION & PRINCIPLES

Sponsorship involves providing material support to a campaign, a person or an organisation to promote our products and our Group.

Patronage aims to support general interest organisations or projects without directly receiving anything in return. The Group can also decide, from time to time, to make donations, for example, to charitable organisations or to educational, cultural or social causes.

Particular vigilance should be applied during these actions to ensure that they are not concealing corruption, influence peddling or undue advantage.

What I should do

- ✓ Follow the relevant internal procedures relating to validating and overseeing sponsorship and patronage activities.
- ✓ Ensure that actions are aligned with the strategic themes defined by the Group.
- ✓ Ensure that actions are carried out for the benefit of organisations whose aim, status, reputation and financial situation have been verified.
- ✓ Produce a written contract to be signed by the Managing Director of the entity.
- ✓ Record and faithfully transcribe the amounts allocated to this type of activity in the company accounts.
- ✓ Monitor the operation and ensure that it is carried out in accordance with what has been agreed.

What I shouldn't do

- ✗ Actions that benefit prospective clients or clients in contractual negotiations or calls for bids are prohibited.
- ✗ Actions involving a public official or a family member of a public official are prohibited.
- ✗ Actions in support of a political party or a politician are prohibited.
- ✗ Actions involving third parties to obtain undue advantage or in return for undue commercial advantage are prohibited.
- ✗ Actions involving payments in cash or payments to a private bank account are prohibited.

EXAMPLES OF SPONSORSHIP & PATRONAGE:

Support for food banks in the form of the donation of funds, equipment or making refrigerated vehicles available for use.

Sponsorship of the Energy Observer boat, providing publicity for the Group as a partner.

6. LOBBYING

DEFINITION & PRINCIPLES

Lobbying is defined as any activity or communication with a public official with the aim of promoting the Group's interests and influencing public decisions.

Lobbying is legitimate so long as it promotes the interests of the Group transparently and in compliance with the applicable laws. It aims to provide arguments and evidence about how public decisions will impact the Group.

In France, lobbying public decision-makers is regulated by law through the *Haute Autorité pour la transparence de la vie publique* (HATVP, lit. High Authority for the transparency of public life) and certain interactions with public decision-makers enumerated in the law have to be declared on the HATVP website. Similar rules apply in other countries in which the Group is active.

The Petit Forestier Group is committed to respecting these rules in all the countries in which it operates.

What I should do

- ✓ Find out about the behaviours to adopt and rules to follow depending on the country in question, and respect local laws.
- ✓ Carry out all lobbying activities in the name of the Group and inform the Compliance officer of any positions to which I have been appointed associations.
- ✓ Enter details into lobbying registers in the countries in which they exist (e.g., the register of the *Haute Autorité pour la Transparence de la Vie Publique* in France).
- ✓ Circulate and communicate information based on reliable, verifiable and up-to-date data to public decision-makers.

What I shouldn't do

- ✗ Influence public decision-makers using gifts, invitations or any other advantage that constitutes corruption.
- ✗ Request third-party professional organisations to lobby for positions in opposition to those of the Group.
- ✗ Circulate or communicate misleading information.
- ✗ Organise meetings or symposia in which participants are remunerated to speak.

EXAMPLE OF LOBBYING:

Legitimate lobbying: A Group employee regularly takes part in work groups organised by Union TLF to discuss, with other sector representatives, the impacts of new regulations and how to defend the interests of the profession with public authorities.

7. MONEY LAUNDERING AND FINANCING OF TERRORISM

DEFINITION & PRINCIPLES

Money laundering is an offence that involves facilitating the fraudulent justification of the origin of illegal property or income. The financing of terrorism means supplying funds or material resources to carry out a terrorist action or for the use of a terrorist organisation.

The Group takes part in the fight against money laundering and the financing of terrorism by constantly monitoring its stakeholders.

Every employee must take part in these monitoring activities, at their own level, by obtaining requisite information from Group clients and partners.

What I should do

- ✓ Pay special attention to knowing about my clients, suppliers and subcontractors when a contract is agreed and throughout the commercial relationship.
- ✓ Remain vigilant and identify unusual, atypical or unjustified operations, or operations that could clearly be illicit.
- ✓ Immediately inform my manager and Compliance of any suspicious activity.
- ✓ Report any potential breach of which I may personally be aware by contacting my manager or the Compliance Officer or by using the internal whistleblowing system set up by the Group.

What I shouldn't do

- ✗ Provide advice or support to any client or supplier operation that might involve money laundering or the financing of terrorism (e.g. advising a client on tax fraud, etc.).
- ✗ Reveal to a client that they are the subject of doubts or suspicions relating to money laundering.
- ✗ Not notify my manager and the Compliance service if I find out about suspicious activity.

EXAMPLES OF MONEY LAUNDERING OR FINANCING OF TERRORISM:

An employee reads in the press that the director of a company they are considering as a prospective client or that is part of their portfolio has been convicted of money laundering related to tax fraud. They must immediately notify their manager and their Compliance service before any further interactions with them or attempts to win their business.

An employee notices that the shareholding structure of a prospective client company is complex and involves entities located in tax havens, or that the company regularly uses cash for transactions. They must notify their manager and Compliance service before pursuing any negotiations.

8. SANCTIONS AND EMBARGOES

DEFINITION & PRINCIPLES

International sanctions are restrictive measures taken by one or several states against natural and/or legal persons (e.g., freezing assets) or against countries or governments (e.g., embargo measures).

These measures are aimed at fighting terrorism and human rights violations as well as respecting international commitments, maintaining peace or resolving conflicts.

The list of countries subject to restrictive measures evolves and is available on the websites of the Directorate General of the French Treasury, the European Union, the UN and countries' government websites.

The Petit Forestier Group complies with all laws and ensures that its commercial operations and its activities respect rules for the relevant international economic sanctions.

What I should do

- ✓ Have a proper and up-to-date understanding of the activities of my clients, suppliers and subcontractors.
- ✓ Remain vigilant and notify Compliance of any violation or attempted violation of international sanctions, or any actions aimed at avoiding them.
- ✓ If I'm not sure, contact Compliance.

What I shouldn't do

- ✗ Conceal information to hide a connection with countries or persons subject to sanctions.
- ✗ Not carry out the due diligence required to come to a proper understanding of the activities of my client or supplier.
- ✗ Provide advice to a client with the aim of avoiding international sanctions.

EXAMPLES OF SANCTIONS AND EMBARGOES:

Examples: freezing assets, travel bans, military embargo, embargo on imports or exports, economic sanctions.

An employee wants to go into business with a supplier within the framework of an innovation project. This supplier is based in a country targeted by international sanctions. They must contact Compliance before contacting this supplier.

9. VIGILANCE IN RELATIONSHIPS WITH OUR STAKEHOLDERS

DEFINITION & PRINCIPLES

The Petit Forestier Group and its employees behave with integrity, honesty and respect in their relationships with third parties (clients, suppliers, intermediaries, subcontractors, etc.).

The Group has implemented due diligence processes to check the probity of third parties with which it does business as well as their respect for ethical rules. These due diligence processes are designed to protect the Group's reputation and image.

What I should do

- ✓ Acquire in-depth knowledge of the third parties with which I am working to be sure of their integrity.
- ✓ Inform Compliance of any information or doubt about the integrity or honour of a third party connected to our Group (e.g., finding out about a conviction for money laundering, corruption or embezzlement).
- ✓ Make sure that an anti-corruption clause has been integrated in contracts with stakeholders and, if necessary, request our suppliers to sign the Responsible Purchasing Charter.

What I shouldn't do

- ✗ Provide confidential information to a supplier about an ongoing call for bids that they are considering applying for.
- ✗ Offer a client discounts without formalising these discounts in the contract or invoices and without respecting the relevant procedures.
- ✗ Fail to notify my manager and Compliance if I find out negative information about a client company or its directors.

EXAMPLES OF VIGILANCE:

Following elections, an employee learns that the representative elected in their constituency is a family member of a director of one of our client companies. This information must be shared with Compliance, as the director will be considered to be a politically exposed person.

A Group supplier asks for payment for their services to a private account or in cash. Immediately inform Compliance about this risk.

10. COMPETITION RULES

DEFINITION & PRINCIPLES

The Group is committed to doing business and maximising its competitiveness in a manner that strictly respects principles of free competition.

Any form of anti-competitive behaviour (unfair terms, abuse of a dominant position, dumping, unlawful agreements, etc.) under the applicable laws and regulations is strictly prohibited and may result in serious administrative, civil or criminal sanctions.

Group companies and employees select suppliers and subcontractors fairly and in a way that promotes healthy competition, using objective criteria such as the prices offered or the quality of the products and services.

What I should do

- ✓ Do not mention sensitive or strategic information (about prices, strategy, the client list, etc.) in discussions with third parties.
- ✓ If these topics are brought up, end the conversation and inform Compliance.
- ✓ If formal meetings are organised with competitors, clearly mention the aim of the meeting and take official minutes of the discussions.
- ✓ Contact Compliance before entering into any agreement that might affect market competition.

What I shouldn't do

- ✗ Make agreements with competitors about dividing up clients or territory.
- ✗ Concert with a competitor and discuss information about prices or clients with them.

EXAMPLES OF SITUATIONS RELATING TO COMPETITION:

An employee takes part in a meeting as a Group representative within a professional association. They may discuss a range of topics but must remain vigilant that these discussions do not have the effect of distorting competition.

NB: even being present as a passive participant in a meeting with an objective that risks being found to be anti-competitive may be considered as entering into an unlawful agreement. If competition rules are not being respected, leave the meeting and ask for this to be noted in the minutes.

11. RESPECTING THE ENVIRONMENT

DEFINITION & PRINCIPLES

Protecting the environment is a major, global challenge.

Preserving the environment is the Group's top concern and it has even made it one of its strategic pillars.

Protecting the environment involves taking measures to limit or eliminate the negative impacts of human activities on their environment.

Furthermore, the Group has been a signatory of the UN Global Compact since 2022 and encourages all its employees to comply with the 17 Sustainable Development Objectives set out in this programme.

What I should do

- ✓ Contribute to Group environmental commitments on a personal level.
- ✓ Maintain a work environment that is healthy and environmentally friendly.
- ✓ Implement optimal waste management procedures and protection of natural resources across all job lines.
- ✓ Contact the CSR representative at my BU/BL or the Group directorate of CSR to report any behaviour or situation that fails to respect the environment.

What I shouldn't do

- ✗ Not sort waste generated by activities and not encourage my teams to sort their waste.
- ✗ Use resources as if they were limitless.
- ✗ Not prefer more environmentally-friendly options.
- ✗ Not notify the CSR officer at my BU/BL or the Group Directorate of CSR if I witness or find out about a situation in which the environment is being harmed.

EXAMPLES OF RESPECTING THE ENVIRONMENT:

Putting in place three or five bins (paper, cardboard, metals, plastics, wood) on the site that you manage and make sure that waste is properly sorted.

Close the workshop doors when the heating is on.

12. HEALTH AND SAFETY AT WORK DIVERSITY AND EQUAL OPPORTUNITY

DEFINITION & PRINCIPLES

Every employee should treat other Group employees with respect as well as any other person with whom they do business on behalf of the Group.

The Group is making health and safety at work one of its priorities and is committed to providing its employees with a healthy, safe work environment and working conditions.

Every employee must respect the applicable health, safety and security rules while going about their duties at work and contribute to a safe and secure work environment by behaving responsibly and remaining vigilant.

The Group prohibits any form of discrimination towards its employees, as set out in articles L1132-1 of the *Code du travail* (French Labour Laws) and 225-2 of the *Code pénal* (French Penal Code), whether as part of the hiring process or as employees go about their work within the Group.

The Petit Forestier Group respects diversity and does not make any decision relating to business, recruitment or hiring based on race or ethnicity, age, sex, religion, political opinion, disability, sexual orientation or any other legally protected characteristic.

Furthermore, the Group promotes equal opportunity in relation to career progression and training.

What I should do

- ✓ Never request a member of my team to carry out a task at work that involves a risk without ensuring that protective equipment has been made available to them and that they know how to use it.
- ✓ Promote from within the company based only on work-relevant criteria.
- ✓ Take care of my health and safety at work and be mindful that my colleagues are respecting these principles too.

What I shouldn't do

- ✗ Have a new team member start working in a position without going through, together, the risks associated with this position and the protective resources available.
- ✗ Choose one supplier over another because it is clear we have the same political opinions.

EXAMPLES OF RESPECT FOR HEALTH & SAFETY AT WORK, DIVERSITY AND EQUAL OPPORTUNITY

A technician is setting off on a job to fix a truck's refrigeration unit for a client; their team leader asks them to check that they have a harness and a hi-vis vest in the maintenance vehicle.

Job applications from men and women are assessed with the same level of interest for a technical position in a workshop.

13. RESPECT FOR HUMAN RIGHTS AND LABOUR STANDARDS

DEFINITION & PRINCIPLES

The fundamental work rights of all workers – based on international standards that define universal principles such as the prohibition of forced labour and child labour, freedom to unionise and maximum working hours – must be respected.

Human rights are the fundamental rights inherent to all humans. They are inalienable and universal, and applicable at every time and everywhere. The right to decent work is a human right.

Our approach is aligned with the spirit and the intentions of the Guiding Principles of the United Nations, the UN Universal Declaration of Human Rights, and the UN Sustainable Development Objectives, which the Group has supported through its membership of the Global Compact since 2022.

The Global Compact offers a straightforward, universal and voluntary framework for taking actions, articulated around ten principles related to respect for Human Rights, international labour standards, the environment and the fight against corruption.

What I should do

- ✓ Guarantee a maximum number of work hours and not work any additional hours.
- ✓ Offer relevant training to employees.
- ✓ Do not hire children who are still of compulsory school age (under 16, with an exception of under 14 in certain countries).

What I shouldn't do

- ✗ Put in place working hours that are harmful to health: no breaks, short recovery times, or absence of leave.
- ✗ Attempt to deny collective bargaining rights: deprive employees of their right to representation, prohibiting strike action, etc.

EXAMPLES OF RESPECT FOR HUMAN RIGHTS AND LABOUR STANDARDS

I don't require a new recruit start to working before they have signed their work contract and the workshop leader has made them aware of dangers related to their job using the safety booklet.

A member of my team ran in the last set of elections organised by the company; they are now an employee representative. However, this has not affected our relationship – I did not hold it against them and, thanks to this, we discuss the collective expectations of workshop staff more regularly; these debates are constructive and positive for the company.

14. BULLYING OR SEXUAL HARASSMENT

DEFINITION & PRINCIPLES

Bullying and sexual harassment are strictly prohibited, as well as any form of sexist behaviour.

The Petit Forestier Group is committed to offering a work environment exempt from any form of harassment. The Group will not tolerate on its sites any violent or offensive behaviour that is liable to create a hostile or intimidating climate.

The Petit Forestier Group will not tolerate the harassment of an individual of any nature or for any reason. In particular, the Group forbids any type of sexual harassment, from unwanted sexual advances to requests for sexual favours and any type of physical or verbal sexual discrimination.

Definition of sexual harassment: repeated comments or behaviour of a sexual or sexist nature which either violate the dignity of a person by being degrading or humiliating, or create an intimidating, hostile or offensive situation for them.

Definition of bullying: repeated behaviour, the aim or effect of which is to degrade a person's working conditions and is liable to violate their rights and dignity, alter their physical or mental health, or damage their future career prospects.

What I should do

- ✓ If I believe I am the victim of bullying or sexual harassment, I must report this to the harassment representative in accordance with the procedure set out in the notification guide
- ✓ If I am a manager and a member of my team notifies me that they have been subject to harassment, I must inform the harassment representative or risk being held responsible for failing to fulfil my obligation to keep my team members safe.

What I shouldn't do

- ✗ A superior or a colleague should never make comments about a colleague that undermine their rights and their personal integrity, such as criticising their physical appearance, their religious beliefs or their ethnic background.
- ✗ A manager must never exceed the limits of their authority, such as excesses in tone, inappropriate comments or objectionable behaviour towards their team, as this constitutes bullying.

EXAMPLE OF PREVENTING BULLYING AND SEXUAL HARASSMENT

An employee reports that they have been the victim of bullying or sexual harassment; the employer carries out an investigation into the facts that have been reported to put an end to the bullying or sexual harassment and, if appropriate, engages disciplinary procedures.

15. PROTECTING PERSONAL DATA

DEFINITION & PRINCIPLES

The Group attaches particular importance to protecting personal data that are given to the Group by its clients, its suppliers and its employees.

It undertakes to process these data in accordance with the laws and regulations that apply in each country in which the Group is active, in particular the European GDPR.

The Group has put in place confidentiality policies that set out the general framework and the conditions under which personal data are collected and processed. If you have any questions or to exercise your data rights, you can contact the Group Data Protection Officer (DPO) at dpo@petitforestier.fr

What I should do

- ✓ Inform the Data Protection Officer (DPO) at the start of every project to identify the potential impacts of the project on personal data.
- ✓ Respect the privacy of employees and clients, and never reveal any private information belonging to them.
- ✓ Ensure that any data collected is useful and relevant.
- ✓ If subcontractors are being used, make sure that they are following the same data protection principles.

What I shouldn't do

- ✗ Move forward with a project involving personal data without checking with the Data Protection Officer (DPO) that it is compliant.
- ✗ Use personal data belonging to clients or employees for other ends than those for which they were collected.
- ✗ Communicate personal data to unauthorised third parties.
- ✗ Not respect the Group security rules and recommendations.

EXAMPLES OF USING PERSONAL DATA

An employee wants to enter information into their prospective client database that seems to be publicly available (e.g. from social media), to integrate it into an email campaign. Contact your DPO to ensure that this practice is compliant and to follow the internal procedures for email campaigns.

An employee is launching a new project to develop an application that will help clients to manage their fleets. Contact the DPO at the very start of the project.

My computer was stolen on public transport and there were unencrypted files containing employee data on it. Immediately inform the DPO and the CISO, who will take the necessary measures. You can always use the charter for using IT and digital tools to secure your files and data.

IV. The whistleblowing system



WHISTLEBLOWING SYSTEM

WHAT IS THE WHISTLEBLOWING SYSTEM?

Our whistleblowing system is designed to report conduct or situations that may constitute a breach of the rules applicable within the Group.

This system is open:

- to all **Group employees**, including external and part-time staff.
- All group **stakeholders**, wherever we are present: clients, service providers, suppliers, subcontractors, etc.

It reflects our commitment to business ethics and fosters a working environment in which everyone can express themselves freely.

WHEN TO USE THE WHISTLEBLOWING SYSTEM

The whistleblowing system can be used to report **any breach of our ethical principles or Code of Conduct** as well as any **breaches of laws and regulations** and any incident that falls into – but not exclusively – the following domains:

- Corruption
- Fraud
- International sanctions and embargoes
- Environment
- Health & Safety
- Discrimination
- Human rights
- Harassment
- Protecting personal data
- Any crimes, offences, threats, or actions harmful to the public, etc.

HOW TO USE THE WHISTLEBLOWING SYSTEM

Reports can be made through the external reporting platform by sending an email to petitforestiergroup.alert@deloitte.fr

The Petit Forestier Group and consulting firm Deloitte guarantee that the information submitted through the reporting portal will remain strictly confidential, as will the identities of the whistleblower and the persons mentioned in the report.

WHAT PROTECTIONS EXIST FOR WHISTLEBLOWERS?

Confidentiality is guaranteed for the whistleblower and the persons mentioned in the report.

The whistleblower cannot be subject to reprisals or threats for having reported or revealed information in accordance with the whistleblowing procedure. This protection against reprisals extends to natural and legal persons connected to the whistleblower.

WHISTLEBLOWING SYSTEM



WHISTLEBLOWER

A single email address for the entire Group:

petitforestiergroup.alert@deloitte.fr

Reports can be made 24/7 in any Group language



RECEIVING THE REPORT AND INITIAL ANALYSIS

An external party receives your report, which remains fully confidential

An external party receives your report, which remains fully confidential

7 days to confirm receipt of the report



EXTERNAL SUPPLIER



COMPLIANCE SERVICES, CSR OR HR

INVESTIGATION AND CONCLUSIONS

Guaranteeing confidentiality and anonymity throughout the entire process

Three months to communicate the conclusions in writing to the whistleblower as well as any planned follow-up actions

TWO OTHER WHISTLEBLOWING PROCEDURES ARE POSSIBLE:

- Alerting external authorities (authorities listed in decree 2022-1284)
- Public disclosure:
 - In the event the external report is not processed
 - In the event of serious and imminent danger, or obvious danger to the public,
 - If the external report is not effective enough

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