



# CODE OF ETHICS OF COVERGUARD

## Sapin II Law

### FOREWORD

*"Ethical Charter", "Ethical Code of Conduct" and "Code of ethics" are interchangeable words.*

### **Why have a Code of ethics, a gifts and hospitality policy, a reporting procedure and disciplinary sanctions (in appendixes)?**

Coverguard is based on values shared by all its employees and ensures that its activities are conducted in accordance with high standards of honesty, integrity and professional rigour. Coverguard therefore undertakes to carry out its activities fairly, honourably, with integrity and in compliance with all applicable legal provisions.

Coverguard therefore complies with the French law on transparency, the fight against corruption and the modernisation of economic life (law no. 2016-1691 of 9 December 2016), known as the Sapin II law.

This law aims to fight against corruption and influence peddling, among other things, and requires the implementation of an anti-corruption compliance program.

This code of ethics, the reporting procedure and disciplinary system are part of this process.

### **What does the Code of Ethics contain?**

This Code of Ethical Conduct has been written with the purpose of describing the fundamental values and principles that Coverguard respects to fight corruption and influence peddling. It emphasises the responsibility of Coverguard and its employees to comply with legal obligations and to avoid practices that do not comply with the defined principles, or that could have a negative impact on the reputation of the Group and its subsidiaries.

## Who is this Code of ethics intended for?

Our ethical charter applies to all employees, regardless of their hierarchical level and the nature of their collaboration, in all countries where Coverguard or its representatives are represented, in compliance with international standards and local laws and regulations. The involvement of everyone in respecting the company's values and ethical principles will enable everyone to better carry out their mission and guarantee Coverguard's image and reputation.

**It is intended to guide and assist employees in making ethical decisions in day-to-day situations where anti-corruption guidelines may be useful.**

In the event of a breach of the principles of this code of conduct, the sanctions set out in the document "Disciplinary sanctions" (see annexes) will apply. Corruption and harassment are also punishable by local laws.

This document is freely available on the Coverguard website and on request. It is available in French, English, Hungarian and Mandarin. The French version is binding.

## Our values

### Constantly surpassing ourself

We strive to achieve new victories every day, with a culture of conquest and self-improvement. We believe in questioning ourselves to keep progressing and provide our customers with the best quality products and services.

### Developing close connection

We believe in the power of proximity. It is a guarantee of simplicity and efficiency. We listen to the needs of our customers, our suppliers and our employees to speed up everyone's performance.

### Act responsibly

Our actions reflect our commitment to ethics, social responsibility, and respect for the environment. We are committed to ensuring that our products and the way they are manufactured have the least impact on our entire ecosystem. We aim at progress, driven by respect for everyone.

## Our mission

Protecting men and women from head to toe in the workplace, all over the world.

More specifically, the aim is to design competitively priced personal protective equipment that is comfortable, reliable, aesthetically pleasing and adapted to the risks involved, while limiting its impact on the environment. This is achieved through constant R&D efforts, through the identification and qualification of increasingly suitable materials, through life

cycle analysis of the products and through co-development programmes with industrial and technical partners.

As the health and safety of end-users is our priority, we guarantee a quality product by rigorously controlling and measuring each stage of the product's life cycle: analysis of uses, choice of materials, product design, certification to European standards, production planning and monitoring, procurement, local logistics, etc. Our products comply with COVERGUARD control standards, and their safety is systematically assessed and controlled. All our products comply with the REACH standard.

## ETHICS AT COVERGUARD

### 1/ RESPECT FOR HUMAN DIGNITY - PROHIBITION OF DISCRIMINATION

The priority given to human beings in all their dignity is paramount for Coverguard. Employees and candidates are considered irrespective of their gender, religion, origin, state of health, sexual and political orientation, level of education, age, appearance, etc., at every stage of their collaboration, from the initial recruitment phase and throughout their professional evolution.

We pay attention to equal representation in our organisation at all hierarchical levels. We will ensure that women and men have access to the same opportunities, rights, opportunities to choose and material conditions.

#### **BAN ON CHILD LABOUR & AND FORCED LABOUR**

The term **"child"** refers to any person under the age of 15 (or 14, depending on the country), any person of school age or any person who has not reached the minimum working age in his or her country. The highest age limit applies. Workers under the age of 18 must not perform any work that is likely to endanger their health and safety.

Coverguard does not tolerate the employment or exploitation of children. Coverguard expects all its business partners, and Coverguard itself, to respect the prohibition of child labour. We are committed to respecting the legal age in the country in which Coverguard operates.

**Forced labour** is defined as any work performed against the worker's will and under external coercion: blackmail, threats, withholding of wages or identity documents, intimidation, violence, etc.

Coverguard rejects all forms of forced labour and expects its business partners, as well as Coverguard itself, to ensure that no employee is forced to work against his or her will, either directly or indirectly.

## 2 / HEALTH AND SAFETY AT WORK

Coverguard is committed to providing a safe and healthy working environment for all its employees. This includes appropriate sanitary conditions, health and safety rules and procedures. We require that all employees and workers are provided with adequate protective equipment free of charge.

Occupational health and safety training is provided every year, and employees with OHS training are clearly identified within the company.

Where necessary, safety information relating to hazardous materials with which they may come into contact is made available to employees.

In the event of fire or any other emergency, emergency exits are clearly and sufficiently indicated. Evacuation routes are clearly described and indicated and must be kept clear. Each floor has fire detectors and fire extinguishers.

All applicable regulations in terms of health and safety at work, hygiene, fire protection and risk prevention must be complied with, and regular training must be provided. Fire drills are regularly organised at different sites.

## 3 / HARASSMENT AT WORK

Coverguard fights against all forms of harassment in the workplace, whether of moral or sexual nature.

According to Article L1152-1 of the French Labour Code, **moral harassment** consists of repeated acts that may lead to a deterioration in the working conditions of the person subjected to them, resulting in an infringement of their rights and dignity, a deterioration in their physical or mental health, or a threat to their professional development.

According to Article L1153-1 of the French Labour Code, **sexual harassment** is characterised by the repeated imposition on a person of comments or behaviour with a sexual or sexist connotation, which undermine their dignity by being degrading or humiliating, or create an intimidating, hostile or offensive situation for them.

Sexual harassment also includes any form of serious pressure, even if not repeated, with the real or apparent aim of obtaining a sexual act, for the benefit of the perpetrator or a third party.

No employee or candidate for recruitment, an internship or a period of in-company training may be punished, dismissed or subjected to any direct or indirect discriminatory measure, in particular with regard to remuneration, training, reclassification, assignment, qualification, classification, professional promotion, transfer or renewal of contract, for having suffered or refused acts of sexual and/or psychological harassment.

No employee may be disciplined, dismissed or subjected to discrimination for having witnessed or reported the behaviour described above.

Any employee found to have engaged in any of the behaviours described above is liable to disciplinary and criminal sanctions.

## 4 / CONFLICTS OF INTEREST

**A conflict of interest** arises when an employee of a company is in a position to influence a group decision likely to confer a personal advantage or to favour himself, a relative or a close associate.

Each employee must put the interests of Coverguard before any other professional or commercial interests of a personal nature. No employee must place himself in a situation where his own interests are in real or apparent conflict with the interests of the group.

For example, it is strictly forbidden to:

- Take personal advantage of commercial opportunities obtained in the course of their work, without first obtaining the written consent of a member of the Coverguard management committee.
- Accepting an appointment to the board of directors of another company or employment outside Coverguard without first obtaining the written consent of a manager or, in the case of the Chief Executive Officer, that of the Board of Directors.
- Carrying out transactions involving personal interests on behalf of the company without the prior written consent of a manager or, in the case of the Chief Executive Officer, of the Board of Directors.
- Recruiting, appointing, sanctioning, or dismissing a member of its family.

At the very least, **any employee who comes across a source of conflict of interest must demonstrate transparency and proactivity**: he or she must explicitly mention it to his or her managers - and possibly to the other people involved - as soon as the situation that could potentially be a source of conflict of interest arises.

## POLITICAL ACTIVITY AND ASSOCIATIONS

The political activities of Coverguard employees must take place outside of work time and workplace.

Coverguard undertakes to fully comply with all regulations in each country relating to relations between associations, political parties and companies.

It is forbidden in all countries to:

- Finance political candidates with company funds
- Reimburse a member of staff for any political contribution
- Use company premises or facilities or soliciting employees during working hours for political purposes
- Engage in political activity on behalf of Coverguard without the express written consent of Coverguard management.

If you have any questions about political activities or associations, please contact the HR or CSR department.

## **UNION/WORKER REPRESENTATIVES**

Coverguard expects its business partners, as well as itself, to respect workers' rights to freedom of association, freedom of assembly and collective bargaining.

We promote social dialogue with the representatives of the Economic and Social Committee (ESC), so that the collective expression of employees is ensured through meetings with the ESC. The role of the ESC is to promote health, safety, working conditions and quality of life at work within the company.

## **5 / CORRUPTION AND INFLUENCE PEDDLING**

**Coverguard does not tolerate any form of corruption, bribery or any other form of advantage granted illegally.** Being convinced of acting in the best interests of Coverguard cannot justify behaviour that contradicts the provisions described. Managers must inform their employees of the content and implications of this code and ensure that it is observed.

**Corruption** is traditionally defined as the use of reprehensible means to influence a person's decisions or cause them to breach their obligations.

Corruption can take two forms:

- Active bribery: any undue advantage offered or promised with a view to obtaining from a third party, directly or through an intermediary, the performance, delay, acceleration, improvement, or abstention from performance of an act that falls within the scope of his or her duties, or that is facilitated by his or her duties.
- Passive bribery: any undue advantage solicited or accepted from a third party in order to perform, delay or refrain from performing, an act that falls within the scope of his duties, or that is facilitated by his duties.

**Influence peddling** is similar to corruption: the difference lies in the need for an intermediary between the potential beneficiary and the public authority, who will use his or her influence to obtain the desired decision.

Coverguard is careful to avoid any dependency or personal obligation to customers, suppliers or other business partners, whether in the form of bribes, kickbacks, kickbacks or other illegal payments.

## **GIFTS AND INVITATIONS**

Coverguard employees, mainly sales staff, may sometimes be asked to offer modest gifts or invitations to our customers in order to strengthen our business relationships.

However, care should be taken when dealing with gifts and invitations and other matters that may be considered as a means of influencing a commercial decision and/or favouring a company or an individual.

To avoid this risk, Coverguard has drawn up a Gifts and hospitality Policy (attached), which all Coverguard employees must refer to and comply with.

## **PROCEDURE FOR SELECTING AN EXTERNAL SERVICE PROVIDER**

Any service that cannot be provided internally may be subcontracted to an external service provider. The following rules must be followed while selecting them :

- **Number of quotes :**

Services under 2500 € : 2 quotes required

Services over 2500 € : 3 quotes required

- **Integration of the following criteria:**

- Qualitative: providing the best possible response to the need, in the most effective and relevant way
- Financial: offer the best terms and conditions, particularly in terms of pricing and sales conditions (free delivery/return, free trial, possibility of cancelling free of charge, etc.).
- If necessary, and if there is a need to choose between several service providers, a CSR criterion may be considered: being a committed company that has implemented actions to reduce its various impacts.

## **6 / FAIR PRACTICES**

Coverguard and all of its employees undertake to comply with anti-trust legislation, laws relating to **unfair competition** and also to **environmental claims** to fight against greenwashing.

**An anti-competitive practice** is any action or behaviour intended to distort, hinder, eliminate or improperly restrict free competition.

These practices include agreements on prices, or to share market shares and calls for tender.

An **environmental claim** is the use of a term highlighting a potentially virtuous criterion of a product or service, without proof and therefore confusing to consumers. For example: "good for the planet", "ecological", etc.

Here are some examples of illegal behaviour:

- Communication to Coverguard's competitors of information on prices, pricing methods, conditions of sale and other important commercial information
- Agreements between competitors aimed at allocating customers, business sectors or service categories in order to restrict free competition
- Agreements to boycott markets, services, sectors, etc
- Advance pricing agreements between competitors
- Sales subject to unlawful suspensive conditions
- Dumping (selling services below cost with the intention of harming competitors)
- Misleading advertising
- Malicious criticism of competitors

Here are a few examples of misleading environmental claims:

- Use of unclear and generic terms such as "environmentally friendly", "ecological", etc.
- Use of images of nature or a planet in advertising
- Promotion of supposedly ecological criteria without proof, such as an life cycle analysis (LCA) of the product

It is the responsibility of each employee to respect fair practices regarding competition and the market. Given the complexity of the legislation and the seriousness of the legal consequences it entails, we recommend that employees turn to the CSR or HR Department for any specific questions you may have.

## **7 / PROTECTION OF PERSONAL DATA**

Given the multitude of communication channels we use every day to serve our customers, we ensure that the data we hold is used exclusively for communicating with customers. The data is not passed on to third parties and all the personal rights of our contacts remain guaranteed.

Coverguard pays particular attention to the application of the RGPD (General Data Protection Regulation), which is currently being deployed within its services. The person in charge of personal data protection is responsible for RGPD compliance and implementation. An email address has been set up to contact them: [rgpd@coverguard-safety.com](mailto:rgpd@coverguard-safety.com).



## **Victim or witness of breaches of this code of ethics: what can you do?**

Any employee who is a victim or witness of one of the subjects covered by this charter (discrimination, forced or child labour, moral or sexual harassment in the workplace, corruption, unfair competition, etc.), whatever form it takes, is required to alert the alert referent as soon as possible after the facts have come to light.

Management and its representatives guarantee the confidentiality of data processing and the safety of any person reporting an incident as defined by the Reporting procedure (see annex).

Witnessing or reporting such behaviour is not grounds for dismissal or disciplinary action, except in cases of clear bad faith and malicious intent.

### **How to alert?**

An e-mail address has been created for this purpose:

**[alerts@coverguard-safety.com](mailto:alerts@coverguard-safety.com)**

The Reporting procedure is detailed in a file appended to this Charter.