

## CODE OF CONDUCT AGAINST CORRUPTION AND INFLUENCE TRAFFIC

### Foreword

The code applies to all employees of the Damartex Group regardless of their company or the country in which they reside. Any question of a collaborator on the application of this code or on its interpretation must be put back to his superior.

### 1. Object of the code

The purpose of this Code is to define rules of good conduct to be followed in the face of situations that may jeopardize the integrity of an employee or his honesty as an employee of the Damartex Group.

This code defines what is bribery and trading in influence and lists, in the widest possible way, without being exhaustive, concrete examples that may concern Damartex.

### 2. Définitions

Generally speaking, bribery is a behaviour by which a person (public official or private person) proposes, demands or accepts directly or through an intermediary a gift, offer or promise, presents or benefits of any kind to perform, delay or omit to perform an act. This act may enter directly or indirectly within the scope of his duties. The purpose of this behaviour is to obtain or maintain a commercial or financial advantage or influence a decision.

There are two types of corruption:

- Corruption is active when it is the person who corrupts who is at the initiative of the corruption,
- Corruption is passive when the act of corruption is initiated by the person who is corrupt, that is to say the person who performs or does not perform an act in exchange for consideration.

Corruption can take many forms under the guise of common business or social practices; this may include invitations, gifts, sponsorships, donations, etc.

Trading in influence refers to the fact that a person has the ability to cash in on his or her real or perceived quality or influence to influence a decision to be made by a third party.

It involves three actors: the beneficiary (the one who provides benefits or donations), the intermediary (the one who uses the credit he has because of his position) and the target person who has the power of decision (authority or public administration, magistrate, expert, etc.).

### 3. Example which could impact Damartex

<b>Arrangement during tariff negotiation</b>	During a negotiation with a supplier, the latter offers me or I propose 2 different prices to obtain the contract. The 1st prize, unofficial, which is the real unit cost of the negotiated coin and a second, official price, the one that will be charged to us and that will be indicated on the contract, higher than the real one. The difference between the 2 prizes will be paid to an account abroad in my name.
<b>Customs payment facilities</b>	The goods are blocked in the customs of the exporting country. The customs officer or I propose a cash payment to speed up the process.
<b>Facilitation payment during a control</b>	During one of my trips abroad, the police officer at the airport informs me that a specific administrative formality on my passport is missing. He tells me that the situation can be arranged with a cash payment.
<b>Promoting purchases from a supplier</b>	The supplier tells me that he will thank me if our turnover with him increases significantly this year.
<b>RFP Management</b>	When responding to a request for proposal, the sponsor tells me that giving it a gift could tip the decision in our favour.
<b>Supplier selection</b>	During a negotiation, my supplier contact person offers me a gift in exchange for a choice in his favour
<b>Negotiating a land or a real estate location</b>	During a negotiation to obtain or transfer a real estate location, the landlord / buyer / seller tells me that there is a way to help decision making and finalization of the transaction.
<b>Maintaining good relationships</b>	During a negotiation with a partner, the partner offers us a "red envelope" to continue to maintain good relations.
<b>Negotiating with a B2D partner</b>	During a negotiation with a B2D partner, the latter tells me that some interlocutors offer him gifts to maintain good relations and stand out from the competition. He invites me to do the same.

### 4. Reporting of practices contrary to the Code of Conduct

Damartex has a whistle-blower system to report any practices that contravene the elements set out in this Code of Conduct.

This system, called *Transparency*, is characterized by a secure email address: [transparency@damartex.com](mailto:transparency@damartex.com).

Any employee who reports in good faith and selflessly, that is to say by being sincerely convinced that his / her statement is accurate, of a violation or a risk of violation of the code to his / her hierarchy or to the designated referent by the company, will be protected against all forms of retaliation. His identity and the facts will be treated confidentially in accordance with the applicable regulations.

Moreover, if a mistake of good faith will not result in any disciplinary measure; denunciations that are intentionally abusive or marked by a desire to harm will be punishable.

## 5. Sanctions

Failure to comply with the rules set out in this Code of Conduct engages the employee's personal liability and exposes him / her to penalties, including criminal penalties, according to applicable laws.

Internally, sanctions can also be applied. They are then established in accordance with the provisions of the Internal Regulations.

## 6. Implementation of this code

It is the responsibility of each employee to implement the Code as part of the responsibilities related to their function.

Damartex conducts periodic checks to verify compliance with practices.

The group's governance bodies regularly report on the follow-up of the implementation and the follow-up given to the alerts.