

## CODE OF CONDUCT AIMING TO FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDLING

### Foreword

The code applies to all employees of the Damartex group regardless of their reporting company or the country in which they reside.

Any question from an employee regarding the application of this code or its interpretation must be escalated to their line manager.

### 1. Purpose of the code

The purpose of this code is to define rules of good conduct to be followed in situations that could jeopardize an employee's probity or honesty as an employee of the Damartex group.

This code defines what corruption and influence peddling are and lists, as broadly as possible without being exhaustive, concrete examples that could concern Damartex.

### 2. Definitions

Corruption is a behavior by which a person (public official or private individual) proposes, requests, or accepts, directly or through an intermediary, a gift, an offer, a promise, presents, or any advantages whatsoever in order to perform, delay, or omit to perform an act. This act may fall directly or indirectly within the scope of their duties. The objective of this behavior is to obtain or retain a commercial or financial advantage or to influence a decision.

There are two types of corruption:

- Corruption is active when it is the person who corrupts who initiates 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 commercial or social practices, including invitations, gifts, sponsorships, donations, etc.

Influence peddling refers to the act of a person selling their quality or influence, actual or supposed, to influence a decision that will be made by a third party.

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

### 3. Cases examples that could impact Damartex

<b>Arrangement during a price negotiation</b>	During a negotiation with a supplier, the latter proposes to me, or I propose to him, 2 different prices to obtain the contract. The 1st price, unofficial, which is the actual unit cost of the negotiated part, and a second price, official, the one that will be invoiced to us and indicated on the contract, higher than the actual one. The difference between the 2 prices will be paid into an account abroad in my name.
<b>Facility payment in customs</b>	The goods are blocked in the customs of the exporting country. The customs officer or myself proposes a cash payment to speed up the procedure.
<b>Facilitation payment during a check</b>	During one of my trips abroad, the police officer at the airport informs me that a specific administrative formality is missing from my passport. He indicates to me that the situation can be sorted out with a payment in cash.
<b>Favoring purchases from a supplier</b>	The supplier indicates to me that he will know how to thank me if our turnover with him increases significantly this year.
<b>Managing a call for tenders</b>	During a response to a call for tenders, the sponsor specifies to me that giving him a gift could tip the decision in our favor.
<b>Selecting a supplier</b>	During a negotiation, my interlocutor on the supplier side offers me a gift in exchange for a choice in his favor.
<b>Negotiation for a plot of land or a real estate location</b>	During a negotiation for obtaining or assigning a real estate location, the lessor/buyer/seller specifies to me that there is a way to work things out to help with decision-making and the finalization of the transaction.
<b>Maintaining good relations</b>	During a negotiation with a partner, the latter offers us a "red" envelope to continue to maintain good relations.
<b>Negotiation with a B2D partner</b>	During a negotiation with a B2D partner, the latter indicates to me that certain interlocutors offer him gifts to maintain good relations and stand out from the crowd against competitors. He invites me to do the same.

### 4. Reporting practices contrary to the code of conduct

Damartex has set up a whistleblowing system to report any practice contrary to 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 in a disinterested manner, meaning being sincerely convinced that their declaration is accurate, a violation or a risk of violation of the code to their hierarchy or to the referent designated by the company, will be protected against all forms of retaliation. Their identity and the facts will be treated confidentially in accordance with applicable regulations. Furthermore, while a good faith error will not lead to any disciplinary action, voluntarily abusive reports or those marked by a desire to harm will be subject to sanctions.

## 5. Sanctions

Non-compliance with the rules set out in this code of conduct engages the personal responsibility of the employee and exposes them to sanctions, notably criminal penalties, according to applicable legislation.

Internally, sanctions may also be applied. They are then established in accordance with the provisions provided for in the Internal Regulations.

## 6. Mise en œuvre de ce code

It is the responsibility of each employee to implement the Code within the framework of the responsibilities related to their function.

Damartex carries out periodic checks to verify compliance with practices. The group's governance bodies regularly review the follow-up on the implementation and the actions taken in response to alerts.