Effective April 03, 2025 - English version

ETHICS CHARTER AND CODE OF CONDUCT

Introduction

Dear Employees,

Our Group attaches the utmost importance to respecting the rules of ethics and compliance. These requirements, rooted in our values of integrity and respect, must guide our day-to-day actions.

The **Ethics Charter** and **Code of Conduct** reflect our collective commitment to combating fraud, corruption and influence peddling. They apply to everyone - employees, agents and partners - and affirm our determination to act in accordance with the highest legal and ethical standards.

Every employee is invited to take ownership of these documents, apply their principles and be vigilant in preserving the Group's integrity. We also expect **the same commitments** from our external partners.

Our Group's reputation rests on the individual responsibility of each one of us. I would like to thank you for your involvement and assure you of the Executive Committee's full support in this exemplary approach.

Frédéric Gauchet
Director & Founder

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Scope and objectives of the Ethics Charter and Code of Conduct

All persons working for Minafin and/or its subsidiaries (hereinafter collectively referred to as "**Minafin**" or the "**Group**"), whatever their contract (employees, temporary staff, trainees, service providers, etc.), as well as the Group's corporate officers (hereinafter collectively referred to as "**Employees**"), must **comply at all times with the laws and regulations in force** in the territories in which they operate and on whose behalf they act. In addition to this obligation, a **Ethics Charter** and a **Code of Conduct apply to all Employees** (hereinafter referred to as the "**Codes**").

The **Ethics Charter (PART I)** defines the general principles of ethical business conduct, and the **Code of Conduct (PART II)** sets out the rules governing the fight against corruption and influence peddling.

The Codes guide Employees in the day-to-day application of the Group's ethical and compliance rules.
They specify the responsibilities of each Employee and affirm the Group's values.
Without being exhaustive, they provide guidelines for compliant conduct, sometimes going beyond mere legal requirements.

Minafin must work with partners who share its values. Its partners (customers, suppliers, subcontractors, service providers, intermediaries, public or private, etc.) (hereinafter collectively referred to as "**Partners**") must adhere to the Codes or any similar system of rules.

The Codes are available in English, French and German.

Compliance with the Codes and responsibilities

In the event of any discrepancy between the applicable legislation and regulations and the Codes, the most stringent standard shall be adopted.

Any Employee who violates the Codes is subject to sanctions (disciplinary sanctions, civil liability, criminal sanctions, etc.). The Group may incur administrative, financial and/or criminal penalties for breaches of laws and regulations. The latter are considered a violation of the Codes.

All Minafin directors, managers and officers (hereinafter collectively referred to as "**Managers"**) are responsible for ensuring that the Codes are properly applied. Managers must set an example and strictly apply the Codes. They must help their Employees understand the requirements of the Codes and how they are to be applied.

Alert duties

If an Employee observes or suspects an infringement or breach of the Ethics Charter or Code of Conduct, or encounters a situation that raises questions, he or she **must report his or her findings and suspicions to his or her Manager or to the designated ethics contacts** (hereinafter collectively referred to as "**Ethics Correspondents**"), as soon as possible, in accordance with the **whistleblowing procedure** in force in the country where the Employee is located. Employees must also raise an alert if they identify a serious threat or danger to the general interest, to the Group or to one of its Employees.

Minafin will take and cause to be taken all steps to verify the infringement or breach, and will treat all information received with the utmost confidentiality

No sanction will be taken against an Employee who has reported possible or actual infractions or breaches in good faith and has cooperated in the investigation of such infractions or breaches, unless the report constituted an abuse of the internal alert system or was of a malicious nature.

Training and awareness

The Codes are distributed to all Employees. They can be consulted on the Group's Intranet and Internet sites.
Each Employee must personally familiarize himself/herself with the Codes and apply them. Employees must examine their individual behavior in the light of the Codes. All Managers are responsible for ensuring that the Codes are effectively implemented and strictly adhered to.

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PART I - ETHICS CHARTER

The Ethics Charter sets out the principles that Minafin and its Employees must apply.

1. Labor standards

Minafin undertakes to treat its Employees with respect, fairness and dignity, and to comply with internationally recognized ethical standards, in particular the United Nations Universal Declaration of Human Rights, as well as with the labor and employment laws and regulations of the countries in which Minafin operates. Minafin's Partners must respect the same values and encourage fair treatment of their own employees.

Any form of labor that forces a person to work against his or her will or freedom, as well as the use, directly or indirectly, of child labor in any country, is prohibited.

Employees, regardless of their function, are required to respect these rules and ensure that the Partners they work with also adhere to them.

2. Mutual respect

Minafin undertakes to treat Employees fairly and ensure equal opportunities. Decisions must be based on competence, qualifications, experience, merit and results, without positive or negative discrimination. Minafin does not tolerate any form of discrimination based on age, gender, race, ethnic origin, sexual orientation, national origin, religious beliefs or any other discrimination of a personal or private nature, in the workplace (or at any work-related event).

Minafin is committed to promoting and maintaining a working environment in which Employees and Partners are treated with dignity and respect. This environment is characterized by mutual trust and the absence of any form of intimidation, oppression, harassment or exploitation.

IN PRACTICE

Q: One of your suppliers makes insulting, misogynistic, racist or age-related remarks to one of your colleagues. How should you behave?

A: If you feel comfortable doing so, ask the supplier to stop. If you prefer, raise your concerns with your Manager or the Ethics Correspondents.

3. Open dialogue

Employees must maintain relationships of trust and constructive dialogue with each other and with Partners. Managers are expected to encourage dialogue between all parties, and to help Employees identify situations that are or may be in breach of the Ethics Charter, and to find solutions to prevent or remedy such situations.

4. Quality, safety, health and environmental standards

When it comes to quality, safety, health and the environment, Employees must never be complacent, compromise or compromise on anything.

Employees must act responsibly to protect and preserve the environment, the health and safety of all individuals, and that of the community in which they interact. This is why the Group is a signatory to the chemical industry's "RESPONSIBLE CARE®" and "CHEMSTEWARDS" (SOCMA) charters.

Employees must be aware of the laws, regulations and internal rules applicable to quality, safety, health and the environment, and must apply them rigorously. Each Employee has the responsibility and personal authority to intervene when he or she observes a breach of these rules, or considers that a situation presents a risk to themselves, to others, to their environment, or to the Group's products and services.

5. Relations with Partners

Employees must respect the Partners and honor the commitments made by Minafin. Minafin requires its Partners to comply with all laws and regulations governing their activities, both in their own workplaces and in those of the Group. They must apply the Codes or any similar system of rules.

Minafin undertakes to apply a structured, fair and ethical process to select and evaluate its Partners, and to ensure their integrity, qualities and ability to honor contractual commitments and build a relationship of trust.

6. Fair competition

The Group prohibits any practice that would impede fair competition. Minafin is committed to complying with all applicable antitrust and competition laws, and expects its Employees and Partners to adhere strictly to them.

All Employees are prohibited from taking any action (agreements, etc.) that would falsify or distort free competition, procure undue competitive advantages or penalize Minafin.

Failure to comply with antitrust and competition laws may result in criminal penalties being imposed on both the Group and the Employee.

IN PRACTICE

Q: A salesperson from a competing company has contacted you to discuss the price of your respective products and the Group's strategy. How should you behave?

A: You must never enter a discussion with competitors about the price of our products or other proprietary information. If you receive a call from a competitor, or if an unknown person approaches you to discuss pricing, politely end the conversation and report the incident to your Manager.

7. Business practices

Employees must ensure that all Minafin's products and services are used in an ethically and legally appropriate manner, and that such use does not circumvent trade control laws, in particular for countries, companies or persons legally under subject to trade sanctions or embargoes by decision of legal representatives of the European Union, the United States of America, the United Nations or any other country in which Minafin directly or indirectly operates.
The same attention must be paid to **combating money laundering**.

8. Use of Group resources

Working time must be devoted exclusively to pursuing the Group's interests, protecting its assets and making appropriate use of the resources and means made available to Employees, in compliance with the internal regulations in force at Group sites.

IN PRACTICE

Q: You're taking a vacation and want to disconnect completely. Can you leave your laptop with a colleague to handle authorizations in the various company systems on your behalf, or give him/her access to your e-mails so that he/she can log in and reply on your behalf? You trust this person completely and share your password.

A: No. Employees should never give their personal password to anyone. Some systems allow you to delegate certain actions; other systems report problems to your Manager in case of absence. If you bypass these controls, you compromise the security of our systems, and put yourself and your colleague in breach of cybersecurity rules.

9. Protection of intellectual property, trade secrets and confidential information

At all times, Employees **must take adequate precautions**, in accordance with internal procedures, to protect Minafin's intellectual property, trade secrets and confidential information. They must ensure that confidential information is disseminated only to those who need to know it in the course of their duties or missions.
These provisions apply equally to Partners' intellectual property rights and confidential information.

10. Privacy and data protection

Employees must respect the privacy of other Employees and Partners. They must protect personal data entrusted to them in a confidential manner. They may only disclose such information legitimately, accurately and securely, in compliance with applicable legislation, if this is necessary to protect the person who entrusted the personal data or the Group within the scope of the Codes.

11. Veracity and sincerity of Minafin's information

Employees must collect, organize, maintain and disseminate information in a timely manner to comply with all legal and regulatory requirements applicable to Minafin's activities and bylaws. All such publications must be accurate and give a true and fair view, without willful omission of relevant information.

Employees must comply with all procedures and controls relating to the collection, organization, storage and dissemination of this information in all regulated areas: social, accounting, tax, quality assurance, safety, health and environmental protection.

Employees must also pay the utmost attention to the application of procedures and the use made of this information in order to prevent theft or its fraudulent or malicious use.

12. Protecting the Group's image

Minafin's good image and the good reputation of its products and services are key to the Group's commercial development and long-term sustainability. Employees must refrain from disparaging them to any Partner or third party in the course of their duties.

Unless authorized by management, no Employee may make public statements on behalf of Minafin.

Employees may express their personal opinions in public but must never imply that they are speaking on behalf of Minafin. This applies in particular to the use of the media, including social media.

PART II - CODE OF CONDUCT

This Code of Conduct sets out the rules that Minafin and its Employees undertake to observe in order to prevent any corrupt practices, influence peddling, conflicts of interest and, more generally, any breach of probity.

It specifies the rules that each Employee must respect in his or her relations (permanent or occasional) with other Employees and third parties.

It defines what Corruption and Influence peddling are, and illustrates the behaviors to be avoided and the situations at risk. It specifies the good practices to adopt in risky situations

1. Fighting Corruption and Influence peddling

GROUP RULES

Minafin adopts an attitude of **zero tolerance** towards all forms of Corruption or Influence peddling, whether public or private, active or passive, direct or indirect. Acts of Corruption are illegal and contrary to the Group's values, with serious consequences in both economic and reputational terms.

Minafin is subject to the laws against corruption and influence peddling in the countries where it operates directly or indirectly. Violation of these laws can result in severe penalties (administrative, criminal, etc.) both for individual Employees and for the Group.

Anti-bribery laws include French *Sapin 2 Law* (Law no. 2016-1691 of December 9, 2016) in France, the US *Foreign Corrupt Practices Act* (FCPA), the United Kingdom *Bribery* Act (UKBA) and other national laws implementing the 1997 OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. There are also provisions in the Penal Codes or Criminal Codes dealing with corruption, notably in Belgium, Germany and Canada.
Most anti-corruption laws **apply <u>extraterritorially</u>**

Employees **will never be penalized** if **they refuse or oppose a corrupt practice**. Employees must forbid their Partners and any other third parties from engaging in corrupt practices, or **initiate the whistleblowing procedure** if they are unable to forbid such practices.

Employees must be aware that **attempting** or **aiding and abetting Corruption** is punishable by the same penalties as the act of Corruption itself.

DEFINITIONS

Corruption: The act of promising, giving or offering, directly or indirectly, a gift or advantage of any kind to a third party (**private** or **public**) with the aim of influencing their decision.

- **Active** bribery: the act of bribing a third party
- **Passive** bribery: agreeing to be bribed by a third party.

Advantage: Undue consideration, whatever its nature (financial, services in return, gift or other), intentionally offered or received without any legal, contractual or professional justification. It can be payment of a bribe or kickback, a gift, fraud, a favor, misappropriation of funds, etc.

Influence peddling: A form of corruption defined as the payment or offer of advantages, directly or indirectly, to a third party exercising real or supposed influence over a person holding public authority or a private individual in order to obtain an advantage or a favorable decision from this authority or individual.

EXAMPLES OF PROHIBITED BEHAVIOUR:

- Accept or offer cash payments;
- make illegal payments (e.g. "bribes" or similar payments, whether made to an Employee, a public official, a Partner or any other third party);
- accept or request to recruit a third party in order for the Group or a Partner to obtain a favorable position in a tender or negotiation;
- offer or receive a sum of money or other benefit :
  - ✓ to obtain information that will enable the Group or a Partner to position itself better in the competitive bidding process,
  - ✓ to encourage preferential contract award.

EXAMPLES OF RISKY SITUATIONS:

- The use of third parties (commercial agents, regulatory agents, etc.) or persons exercising a public function (= "public official") claiming to be able to assist in the proper conclusion of a contract or compulsory formality in exchange for an Advantage.
- Being under pressure because the deadlines are too short to obtain the necessary administrative authorizations in the normal way.
- Operating in countries with a high Corruption index.

GOOD PRACTICES

Employees must **immediately report** any attempt at bribery using the designated whistleblowing system.
Employees must also ensure that all transactions **are justified**, **properly documented** and duly **approved**. They must always be able to justify any payment (including rebates, discounts, etc.).

2. Gifts and invitations

GROUP RULES

Employees **must not offer Gifts** to Partners or any other third party, either **to induce them to make a decision or to reward such a decision**. Conversely, Employees **must not accept such offers**. These practices are considered to increase the risk of Corruption, for which the Group applies a "zero tolerance" policy.
However, Gifts (whether given or received) are tolerated if they are **reasonable and symbolic** in terms of value (e.g. box of chocolates, etc.).

Gifts or invitations may **never** be offered to or received from **a public official**, nor may they **consist of payment in cash or its equivalent** (vouchers, e-cards, etc.).

Definition

Gift: Any form of payment, gratuity, invitation to social events, entertainment, leisure travel, accommodation, meals, or any other benefit in kind or material goods, remuneration or profit (monetary or non-monetary), offered or received.

Examples of prohibited behaviour:

- offer or receive directly or accept indirectly personal benefits from a supplier;
- respond favorably to an invitation to attend a sporting event from one of your suppliers if the invitation is intended to influence your decision to work with the supplier in question, or to secure the process of sourcing materials from that supplier;
- offer a potential customer full coverage of their expenses (hotel nights, meals, travel) at an international trade fair with the aim of influencing their decision to entrust the Group with the production of a given product.

Examples of risky situations:

- Gifts of a value that does not comply with the present rules, including the rules applicable to expenses reimbursable by expense report.
- Solicitation of invitations by a person with the power to influence a decision affecting the Group's interests.

Good practices

Employees must consider how the Gifts offered would be perceived by third parties. To be on **the safe side**, Employees must systematically ask and contact their Manager if they are faced with such a situation

The Employee must refuse the Gift if it does not comply with this Code of Conduct.

IN PRACTICE

Q: You're in discussions with one of the shortlisted suppliers regarding the supply of a material; the latter offering to cover all your expenses at your next meeting (hotel nights, lunches and dinners) as well as an invitation to a sporting event. How should you behave?

A: You must refuse this offer as it is being made in a decision-making context.
You must report it to your Manager.

3. Facilitation payments

Group rules

Employees are prohibited from making Facilitation Payments. Whether or not such payments are commonplace in certain parts of the world, they are not tolerated by Minafin. They can be assimilated to Corruption and expose the Group and its Employees to severe penalties.

Definition

Facilitation payments: The fact of paying, directly or indirectly, in an undue manner, a public official for carrying out administrative formalities, which should be obtained through normal legal channels. It aims to encourage public authorities to process a request more quickly or as a priority.

EXAMPLES OF PROHIBITED BEHAVIOUR:

- make payments to public officials not covered by a legal invoice;
- offering, directly or indirectly (via a public official's intermediary), a sum of money to a public official in order to speed up authorization procedures in a country, or accepting a solicitation for a sum of money from such a public official;
- give in to a customs agent's proposal to speed up the customs formalities you need to complete for one of your products and for which you are experiencing difficulties, in exchange for payment of a fee;
- give in to the solicitation of a public official who has to issue a building permit or operating license essential to the operation of a Group site, and who promises to "speed up the process" in exchange for a fee.

EXAMPLES OF RISKY SITUATIONS:

Any situation in which the Employee feels excessive pressure, in terms of time or impact, to obtain an administrative authorization or license necessary for the continuity of the Group's activities.

GOOD PRACTICES

Employees must courteously but firmly **refuse** any request for Facilitation Payments on the basis of this Code of Conduct, and must keep a record of their refusal. They must immediately **report any such refusal** to their Manager.

IN PRACTICE

Q: You want to speed up the process of obtaining a building permit because the current procedure is "too long". An official from the competent local authority responsible for issuing building permits suggests that you opt for a new fast-track procedure costing €800, even though such a procedure is not provided for under the applicable law. What should you do?

A: You must not accept this proposal. It is tantamount to making a Facilitating Payment, and as such, constitutes a corrupt act.
You must inform your Manager immediately.

4. Use of third parties (including Intermediaries)

GROUP RULES

The Group requires all Partners with whom it has dealings to conduct their business in an **ethical** manner, and to comply with **all legislation concerning the fight against Corruption and Influence peddling**. Under no circumstances can the Group expose itself to **complicity in** behavior contrary to the rules of the Code of Conduct.

Before committing to a partnership, the following actions are required:

- communicate this Code of Conduct and the Ethics Charter to the Partner in order to make them aware of the Group's rules in terms of ethics and the fight against Corruption, and to ensure that **the Partner adheres to them or to similar codes**;
- in the event of situations presenting a high level of risk or suspicions arising from a Partner (the Partner is located in a country with a high risk of corruption, the Partner is asking for a commission or remuneration which is excessive in relation to the services provided, etc.), carry out an in-depth check on the Partner.
- in situations presenting a high level of risk, not to start the partnership until a contract has been duly validated by the Group's legal department.

Employees must be especially vigilant when using Intermediaries acting on behalf of the Group and/or in the name of the Group, particularly when interacting with **public officials or customers**. The Group may be **held liable** for any acts **committed by these Intermediaries in breach of applicable laws and regulations**.

DEFINITION

Intermediary: Any person who, without having the status of employee of the Group, acts, within a contractual framework or not, for the account and in the name of companies of the Group, and in particular, without this list being exhaustive:
- sales agents who may or may not have dealings with public officials or customers;
- regulatory agents who deal with public officials;
- lobbyists in contact with public officials;
- officials who generate customs clearance of imported or exported goods, etc.

EXAMPLES OF PROHIBITED BEHAVIOUR:

- work with a Partner who refuses to accept a commitment to fight Corruption and Influence peddling, or whose past activities and reputation give rise to legitimate suspicion of unethical business practices;
- pay a supplier an amount exceeding the market price in exchange for preparing the documentation required for qualification, even though this documentation would not have enabled qualification to be obtained if it had been prepared rigorously, under normal conditions and in compliance with regulatory requirements;
- pay a commission to a sales agent that is not provided for in the contract validated by the Group's legal department.

EXAMPLES OF RISKY SITUATIONS:

- The Partner operates in countries with a high Corruption index.
- The Partner offers favors or advantages that do not comply with the rules set forth in this Code of Conduct.
- The Partner requests payment - or proposes payment - in cash or any other unusual form.
- The Partner refuses to submit to an audit request in the tendering or contracting process.

GOOD PRACTICES

When dealing with Partners, including Intermediaries, the Employee must carefully **monitor** such relationships and **be alert to** early warning signs of corrupt practices on their part.

IN PRACTICE

Q: You work with a sales agent. The agent offers his support, claiming that he can help Minafin obtain a contract to supply one of your products to a customer, and suggests that he may have to pay commissions to a third party. How should you behave?

A: You must refuse the proposal (whether the commission is to be paid by the Intermediary or Minafin) as it is in contradiction with anti-Corruption rules and, if accepted, would constitute an offence.
You must also inform your Manager.

5. Preventing Conflicts of interest

GROUP RULES

All Employees may be confronted with situations in which their personal interests, or those of their close relations, are or could be in conflict with those of the Group. **All Employees must refrain from participating in any decision-making or management process with a third party or Partner in the event of a Conflict of interest**. In such a case, the Employee must immediately **inform** his/her Manager, as far upstream as possible of the relationship, so that an alternative solution can be put in place to stop or avoid the Conflict of interest.
Employees must never compromise their **objectivity** or **fairness** to Minafin. They must demonstrate the highest level of integrity. Decisions must always be made and actions taken in the best interests of the Group.

Poorly understood, Conflicts of interest can be a factor contributing to **fraud** or even **Corruption**. Even when there is no intention to corrupt, Conflicts of interest can have serious consequences if they are not disclosed.

DEFINITIONS

Conflict of interest: Interference between the mission entrusted to an Employee and his or her personal interests, likely to influence his or her choices and to call into question the neutrality/impartiality with which the Employee should normally perform his or her duties.

EXAMPLES OF PROHIBITED BEHAVIOUR:

- influence the hiring, job evaluation or remuneration of a relative ;
- use confidential information or any other Group resource for your personal benefit or that of a relative;
- conceal information about any Conflict of interest, even potential;
- choose work with a Partner, not because of the competitiveness of its offer and other objective criteria, but because of its relationship to you or a service rendered personally by that Partner to you (work on your home, etc.).

EXAMPLES OF RISKY SITUATIONS:

A situation may be considered risky if it arises from:

- a secondary job or a job for relatives, whether paid or unpaid,
- personal interests in a Partner,
- business transactions or decisions that indirectly benefit close relations,
- an elective office held by the Employee,

- direct or indirect shareholding in a Partner.

GOOD PRACTICES

Employees must remain alert to any **actual or potential situation** of Conflict of interest and must **report**, in accordance with the rules of this Code of Conduct, any situation that could give rise to a conflict between their personal interests and those of their professional life, without omitting anything

IN PRACTICE

1) Q: A Group supplier tells you he'll help you with work on your home. What do you need to do?
A: You should not accept the supplier's proposal. It's a conflict of interest because the supplier could be doing you a favor in order to get an advantage or something in return. You can use the supplier's services, but you must pay the same price as that offered to the public.

2) Q: One of your personal relations controls a company with a potentially interesting business for the Group. This company has submitted a very attractive offer, and you may find yourself involved in the decision-making process to place an order with them. What should you do?
A: Even if the offer seems favorable, you must immediately inform your Manager of this potential conflict of interest, so that the final decision is as transparent as possible and based on objective criteria. **In any case, the decision to place the order cannot be taken by you.**

3) Q: You own shares in a company whose activities compete with those of the Group, or which could be a Partner. What should you do?
A: You must inform your Manager.

6. Donations, Sponsorship, Patronage (or "Sponsoring")

GROUP RULES

The Group may only make donations (monetary or non-monetary) to a foundation or cause or engage in Sponsorship or Patronage (or "Sponsoring"), in **compliance with applicable laws and the Codes**.
All contributions to the financing of an electoral campaign or donations to a political party or person are prohibited.

DEFINITIONS

Patronage (or "Sponsoring"): material support provided, without any direct counterpart on the part of the beneficiary, to a charity, a social, cultural or sporting project or to an individual for the pursuit of activities of general interest and beneficial to the Group's image, social appeal and communications.

Sponsorship: financial or material support given to a third-party organization, event or individual in order to promote the company's values and communicate its brand and image.

Examples of prohibited behaviour:

- make donations, Sponsorship or Patronage operations, with the aim of influencing a decision by a public official or a third party, or of establishing or maintaining a commercial relationship;
- Proposing and deciding on donations, Sponsorship and Patronage operations for entities with direct or indirect personal ties to the sponsoring Employee;
- carry out donations or Sponsorships during bidding periods or, more generally, during periods likely to generate a Conflict of interest.

Examples of risky situations:

- Any situation in which there is a potential Conflict of interest between the recipient of the donation or Sponsorship and the person suggesting it.
- Donations, Sponsorships, Patronage made to an independent administrative authority, associated or member of a control or certification body, that is called upon to rule on a matter concerning the Group.

Good practices

Donations, Sponsorships and Patronage must be **approved in advance by the Group's Director.**

IN PRACTICE

Q: The local government official in which one of the Group's plants is located is offering the site financial support for the local soccer team. He points out that this support would avoid the refusal of the building permit required for the works that the site wishes to carry out. How should you behave?
A: You don't have to accept this proposal. It could be accepted, but not while the permit is being processed. This would expose the Group to accusations of active corruption, as the sponsorship is the consideration required by the public official to obtain the building permit. You should also inform your Manager.

7. Representation of interests (or "lobbying")

Group rules

The Group may be called upon to represent its interests (or "lobbying") so that its activities are better known and understood, and to inform public decision-making. The objectives and methods of lobbying actions are defined by the **Group's Director, in compliance with applicable laws and regulations**.
Under no circumstances will Minafin tolerate an Employee offering, directly or indirectly**, an Advantage** to **a public decision-maker** in order to induce the latter to take a decision or support a law or activities that would be favorable to the Group or, on the contrary, to reject or block a law or activities that would be unfavorable to the Group.

Definitions

Lobbying: The act of influencing, directly or indirectly, a public decision, including the content of a law or regulatory act, by entering into communication with one or more public decision-makers.

EXAMPLES OF PROHIBITED BEHAVIOUR:

- commit the Group (through the use of its name or image), directly or indirectly, to political support or activities;
- use the Group's financial resources to engage in fundraising or political support activities;
- create situations of actual or potential Conflict of interest in the exercise of your lobbying activities that would otherwise be authorized.
- Remunerating a lobbying firm with no reasonable connection to the services provided.

EXAMPLES OF RISKY SITUATIONS

Any situation in which the Group asserts its interests to a public decision-maker in a non-transparent manner or by offering consideration in order to obtain political support to change a law or regulation that is unfavorable to it or, on the contrary, to avoid a law or regulation that would become unfavorable, in Belgium or abroad.

GOOD PRACTICES

Employees who are authorized to engage in lobbying activities are required to do so in compliance with applicable regulations and this Code of Conduct. They must also ensure that they are fully **aware of the Group's position** and have **obtained prior approval before engaging in such activities**.

8. Relations with public persons (or "public officials")

GROUP RULES

In the course of its business activities, Minafin is required to interact with public officials, in particular to obtain the administrative documents necessary to carry out its activities. These interactions must be conducted **honestly**, **independently** and **transparently**, and **in accordance with the rules laid down in the Codes**. Minafin undertakes to provide all information required by regulations.

The Group prohibits Employees from offering or promising an Advantage to public officials, or accepting such solicitations from them. **Such acts may constitute Corruption and may be punished**.

EXAMPLES OF PROHIBITED BEHAVIOUR:

- deliberately concealing, altering or deleting documents requested by a public official, with the aim of obtaining a certification, registration or authorization which, if transparent information had been provided, would not have been obtained;
- soliciting a consultant to influence a public official in order to obtain or facilitate the obtaining of a certification (HSE, ISO, etc.)
- give a public official (a representative of the industrial site control authority, an inspector from the health authorities, etc.) a Gift.

Examples of risky situations

Any situation in which the Employee feels too much pressure, in terms of time or impact, to an essential administrative authorization or license.

Good practices

All Employees must be vigilant and **inform themselves in advance of the specific rules applicable** (reception conditions, meals, accommodation applicable to public officials, etc.) before interacting with a public official. If an Employee finds himself in a high-risk situation, he/she must immediately **report the matter** to his Manager.

IN PRACTICE

Q: Can you offer a gift to a representative of a health agency who has come to inspect the site, with the intention that he or she will make a decision in favor of the site?

A: No, offering an advantage of any kind to a representative of a public official or a third party in order to induce him or her to use his or her influence over a public authority to obtain a favorable decision constitutes an act of Corruption. Furthermore, the present Code of Conduct stipulates that <u>no</u> Gift may be offered to a public official, even if the purpose of the Gift is not to obtain preferential treatment

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APPENDIX

<u>Questions to ask when in doubt:</u>

Compliance with the Ethics Charter and the Code of Conduct is **mandatory**. No tolerance will be accepted in the event of violation. Not all risk situations are necessarily listed in these Codes. However, they must all be dealt with. If you are wondering how to deal with a risky situation, the answers to the following questions may help you make the right decision:

- Is my action authorized by the Ethics Charter and the Code of Conduct?
- Is my action likely to put the Group in danger or in an illegal or unethical situation?
- Could my behaviour harm the Group's activities and/or reputation?
- What are the potential consequences of my action?
- Am I comfortable explaining my decision to colleagues, family or friends? Would I feel comfortable if someone treated me the same way?
- How would my action be perceived if published on social networks?

Should you have any questions or doubts about the Ethics Charter and the Code of Conduct, *contact your Manager or your Ethics Correspondents.*

Ethics Charter and Code of Conduct 2025-04-03 en-VF

Final Audit Report 2025-11-05

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