



hemeria

GROUP CODE OF ETHICS



Message from the CEO



Since HEMERIA was founded in 2019, we have consistently promoted the values of respect, collective effort, performance, and commitment to our teams, our partners, and our customers. This mindset has been driving HEMERIA's development for many years.

Management is committed to embodying and nurturing this culture every day, while transmitting these fundamental values and upholding the rules of ethics that are rooted in our company's identity.

Given the scale our Group has reached, we recognized the need for a formal Code of Ethics to define the principles that guide our conduct. This document serves as a reference for everyone at HEMERIA, outlining the rules that govern our business practices and our relationships with all our stakeholders. To deliver tangible results, this Code must be upheld by all our employees and the entire management team. At every level in the company, we must all commit to ensuring compliance with it.

Nicolas MULTAN
CEO

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Foreword

HEMERIA's rules of ethics are founded on three pillars, representing crucial stakeholders:

- **Employees**
- **Customers, suppliers, subcontractors, and partners**
- **Society as a whole**

Managers are responsible for ensuring that this Code of Ethics is disseminated, understood, and effectively applied within their teams.

This Code also sets out our expectations of our suppliers, subcontractors, and partners regarding ethical conduct. More generally, it will be communicated as necessary to our external stakeholders, including our customers, suppliers, partners, subcontractors, shareholders, as well as local and national governments.

Our Code of Ethics outlines our Group's commitments to these key stakeholders.

I. Employees

HEMERIA can only achieve growth and success if we value our internal resources—above all, our employees who drive the **company's innovation, performance, and future**. We make this a key priority for our development, particularly by implementing an appropriate management system.

The individual development of each employee is a prerequisite for the company's collective success. At HEMERIA, we are particularly committed to upholding three key principles:

- **Equal treatment**, which means preventing discrimination based on origin, gender, sexual orientation, age, political or religious views, union membership, or disability. Any consideration that is given to the nationality of an individual must be strictly limited to the exceptions outlined in national legislation regarding the protection of national interests.
- **Respect for the individual**, which means prohibiting any behavior that undermines this principle or respect for privacy. Individual data concerning employees must only be collected or held by HEMERIA in compliance with this principle and its use must be strictly limited.
- **Maintaining a safe and healthy work environment**, by adhering to applicable legal provisions, following procedures and general principles for the prevention of occupational hazards, and providing regular training for employees.

In your relationships with your co-workers, managers, and team members, we expect you as an employee to:

- **Fulfil your commitments;**
- **Be transparent with regard to the information you hold;** and
- **Ensure your own safety** and that of your colleagues.
- **Employees owe the Group loyalty and integrity.** Therefore, while employed at HEMERIA, employees may not work for an actual or potential competitor without our prior consent.

- **All employees are expected to protect the Group's tangible and intangible assets**, as any loss, theft or unlawful use could be significantly detrimental to us. Any incident, damage or malfunction affecting Group equipment should be reported.
- **Special care should be taken with HEMERIA's confidential information** relating to our products, processes, expertise, staff, or industrial, strategic, and financial operations. This information may not be disclosed or made public without the consent of the relevant persons or third parties.
- On all matters of common interest, we prioritize **cooperation with our employees and their representatives**, ensuring they receive accurate and timely information.

II. Customers, Suppliers, Subcontractors, and Partners

At HEMERIA, we build **long-term relationships** with our customers, suppliers, and subcontractors based on **trust and mutual respect**.

A. Customers

The satisfaction of our customers must be the priority of all HEMERIA employees.

This means:

- Paying close attention to their needs, to provide clear, complete, and precise offers;
- Focusing constantly on the quality of the systems, equipment, products, and services we offer;
- Meeting our commitments in terms of timely delivery, and product quality and safety;
- Monitoring and servicing the systems, equipment, products, and services we supply.

At HEMERIA, we are committed to conducting business fairly in compliance with applicable legislation and practices. Within the Group, we prohibit any behavior that could be considered public or private corruption and/or influence-peddling.

B. Suppliers, Subcontractors, and Partners

At HEMERIA, our relationships with our partners are based on cooperation and **mutual loyalty**.

With regard to our suppliers, this loyalty implies respect for the Purchasing Process:

- **Transparency regarding rules and selection strategies**, and especially fair treatment of companies in competitive bidding procedures;

- **A commitment by the supplier or subcontractor to sign and comply with the HEMERIA Supplier Code of Conduct;**
- **An undertaking to apply the terms negotiated**, especially payment terms and intellectual property clauses;
- **A guarantee of neutrality and independence** in relations between HEMERIA and our suppliers.

All Group employees, whether buyers or line personnel, have a **duty of integrity**.

This means refusing any personal advantage, gift or invitation that does not comply with the Group's policies in this area. On no account may the personal interests of an employee influence the choice of a partner or any other decision concerning them. Employees should inform their manager of any potential conflict of interest as soon as they are aware of it.

Managers should be particularly alert to any potential conflict of interest between a partner and an employee that is brought to their attention.

At HEMERIA, we expect all our partners to comply with the principles stated, particularly those relating to human rights, labor law, environmental protection and the fight against corruption.

III. Society as a Whole

A. Environmental Respect

HEMERIA is committed to protecting the environment through a proactive **action plan** aimed at reducing the environmental impact of our sites and operations, as part of our CSR Policy.

HEMERIA complies with national, European and international regulations on the environment, and deploys appropriate systems to manage and assess environmental performance.

HEMERIA publishes appropriate information on the environmental impacts of its operations.

B. Corporate Citizenship

At HEMERIA, we ensure **full compliance with national and international regulations**, with a particular focus on all applicable safety standards.

We uphold the principle of **strict political, religious, and philosophical neutrality**. Therefore, we do not make any financial contributions to political candidates, elected officials, or political parties.

However, HEMERIA employees are free to participate in political life in a personal capacity, outside the workplace and their working hours, but they must not use the Group's image to support their involvement.

IV. Reporting a Concern

At HEMERIA, we foster a culture of trust, based on ethics, integrity and compliance, and we encourage employees to share their doubts and concerns about any situation or behavior that is contrary to this Code of Ethics or violates any laws or regulations.

It is important to speak out, to voice your questions and concerns, and to report any potential violations in order to protect the Group and the interests of our stakeholders.

Employees may report a concern to their line manager, to the site HSE coordinator, or directly to the Quality or Executive Management team by email, letter, or phone.

No sanctions or discriminatory measures will be taken against any employee who raises a concern, even if the reported facts are found to be inaccurate or do not lead to any action.