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INTEGRIS COMPOSITES

CODE OF CONDUCT



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Integris Composites – Code of Conduct

Our Code of Conduct applies to all salaried employees, interns, temporary personnel, and other people assigned to work on the premises of Integris Composites and its subsidiaries (hereinafter referred to as "employees").

The Code of Conduct establishes the basic principles that underpin all of our company's actions.

In the course of doing business, we establish relationships with other parties: suppliers, developers, partners, customers, etc. These relationships require mutual trust. They are founded not only on our expertise, technological skills, and the quality of our products, but also on our way of working, our approach to environmental issues, and our commitment to social responsibility.

The countries in which we do business have very different laws from one to the next. It is our duty to comply with the laws of each country in which we operate. We must also be sensitive to the cultures and customs of these various countries, and respect the local communities and their environment.

For these reasons, Integris Composites has established this Code of Conduct, with which employees must comply or otherwise face disciplinary measures, without prejudice to other potential sanctions.

If you have any questions, do not hesitate to talk to your supervisor. You can also contact your Director of Human Resources or send an email to ethics@integriscomposites.com.

Our Code of Conduct is shared with all new employees joining the company and is integral to the Group's anti-corruption training programmes. It can be consulted at any time in the HUB.

Our Code of Conduct may be updated to take into account new concerns or regulatory needs. Integris Composites undertakes to communicate to employees the details of any edits made.

Directors

Signed by:
Helle Specht
8A78E4C7226A422...
Helle Specht

Signed by:
DEREK SHERWIN
343997E909004C5...
Derek Sherwin

Signed by:
11AA62447EF1412...
Jan Grimberg

Signé par :
Marthe Bégin
03E82051E32F436...
Marthe Bégin

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I. Mission and values

1. Mission and vision

Any action taken by Integris Composites must be closely connected to the company's stated mission, which is as follows:

We design, test, certify, and manufacture light armour and protection solutions for road vehicles, ships, aircraft, and people, for demanding OEM customers.

Our VISION is to be "the global strategic partner for survivability solutions".

2. Values

The values of Integris Composites support our mission and vision:

1. Goodwill – demonstrate team spirit
2. Alertness – act in time
3. Honesty – to help us go further
4. Dedication – show interest and take initiative and responsibility
5. Creativity – think outside the box
6. Adaptability – stay open to new ideas
7. Reliability – make promises you can keep, and always keep them
8. Positivity – we foster a good work environment
9. Quality-oriented – contribute to continuous improvement
10. Value creation – do all of the above every day
11. Meticulousness – we undertake to uphold our commitments to all stakeholders to maintain their trust.

II. Anti-corruption Code of Conduct

1. Definitions

Corruption is characterised by the action of:

- Proposing, soliciting, or accepting,
- Directly or indirectly (i.e. via an intermediary),
- Any type of undue benefit (promises, gifts, or advantages of any kind),
- In exchange for the beneficiary carrying out or abstaining from an act that falls within the scope of their duties.

Corruption is considered **public** when a person in public service solicits or accepts a benefit in exchange for a favourable decision, with it being explicitly noted that:

- The definition of a "public official" is very broad (examples: a mayor, a civil servant, a customs officer, etc.);
- Public corruption is punished more severely.

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Corruption is considered **private** when the acts in question are carried out in the context of commercial activities (examples: awarding a contract to an external provider in exchange for the payment of a kickback).

Trading in influence involves three people and consists in:

- Promising something to someone,
- So that they use their influence,
- On a third party (e.g. a foreign authority),
- To obtain a favourable decision or opinion,
- Whether the influence is real or presumed.

2. Gifts and invitations

Integris Composites undertakes to ensure that its employees abide by the requirement to neither give nor receive any gifts of a total value exceeding €73, inclusive of VAT, or the equivalent in foreign currency. Each gift and invitation given must be declared in the dedicated reporting tool. Each gift received must be declared to the employee's supervisor and to the local Director of Human Resources.

If you have any doubts, or if the total value of the gifts exceeds this limit, please contact your local Director of Human Resources.

Gifts in cash or cash equivalents (e.g. gift cards) and gifts given in exchange for money are never permitted under any circumstances.

Examples of risk situations:

- The sales team manager invites a public procurement officer to a prestigious event with the goal of winning a contract from an invitation to tender, even though Integris Composites' tender does not meet all of the technical specifications.
- A sales team member offers a public procurement officer an undue benefit in exchange for modifying the technical specifications in favour of Integris Composites.

3. Facilitation payments

Facilitation payments are sums paid informally with the goal of simplifying or accelerating certain procedures, notably administrative procedures, such as obtaining licences or visas, or clearing goods through customs. These payments are strictly prohibited, whether they are paid directly to a public official or to an intermediary.

Examples of risk situations:

- An Integris Composites employee offers money to a civil servant of the Ministry of Defense of a country to speed up the granting of a licence to export a product.

4. Conflicts of interest

A conflict of interest is any situation in which a personal interest interferes with a duty within a company, such that the interference influences or appears to influence the proper fulfilment of the duty on behalf of the company.

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Such personal interests may result from financial or professional commitments, or from political or ideological affiliations that the employee may have outside the Group.

Any situation that may give rise to a conflict of interest is strictly prohibited. This applies to each of the company's employees, as well as their spouse, their children, and their parents.

All conflicts of interest, whether real or potential, must be reported to the local Director of Human Resources.

Examples of risk situations:

- An employee gets a family member hired by the company without informing their superiors, while knowing that the hired family member does not have the required qualifications.
- During a tendering process, a member of the supply chain team awards the contract to their brother-in-law's company, even though the company's prices are higher, in exchange for an undue benefit.

5. Philanthropy and sponsorships

In principle, Integris Composites does not participate in any philanthropy or sponsorships. Any such requests must be transmitted to the Managing Director for consideration.

6. Representation of interests/Lobbying

Lobbying is when an entity interacts with public officials, directly or indirectly and by various means, with a view to influencing a public decision in favour of the interests of the said entity. Such lobbying actions must be declared to the management of Integris Composites who will take appropriate measures depending on the legislation of the country.

For example, Integris Composites is required to declare its lobbying activities in France in a specific national register.

Examples of risk situations:

- The R&D director contacts a military general and offers them undue benefits (gifts, invitations, etc.) in order to get the general to use their power to influence a decision in favour of the interests of Integris Composites.

7. Patronage employment and hiring

Patronage employment is the hiring of a person, no matter the type of work contract or agreement, because of a special relationship between the said person and a person belonging to Integris Composites or one of its subsidiaries, or any other third party involved in the Group's business, in exchange for an undue benefit.

Patronage hiring is prohibited. All hiring of employees must be based on objective criteria.

Any conflict of interest in the hiring process must be reported in advance to management and/or to the Human Resources Department.

Examples of risk situations:

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- An employee offers an internship to the goddaughter of a member of parliament in exchange for the said MP voting for legislation that could be favourable to Integris Composites.

II. Best practices

1. Recording of transactions

All transactions with customers or business partners must be recorded in writing. The records must be complete, justified, and error-free, in accordance with applicable standards. Payment in cash is prohibited, unless the cash payment is made in accordance with recognised audit procedures. If you have any questions, please contact your local Director of Human Resources.

No employee may destroy, delete, or modify any document (whether paper or electronic) belonging to the company when the document is subject to an inquiry or to criminal, civil, or administrative litigation.

2. Export control

The term “export” refers to any transfer, in any form whatsoever, including by email, oral conversation, or presentation, of products, services, software, or technology from one country to another or to a non-resident. This also applies to deliveries to a foreign subsidiary of Integris Composites. A discussion with a foreign person, even someone located within your country at the time of the exchange (such as a natural person who is not a legal permanent resident of your country, or a foreign company), that reveals technical information related to exports may constitute an export.

All employees of Integris Composites must comply with applicable regulations on exports, customs procedures, and commercial controls, as well as with licensing requirements.

3. Competition and non-competition

Integris Composites undertakes to ensure that its employees abide by the requirement to refrain from any practices that might violate the rules of fair competition. It is forbidden to collude with the Group’s competitors or business partners to limit competition (agreements on price-fixing, market share, boycotts, etc.).

Any violation of anti-trust laws constitutes a serious offence and may result in legal action against the individuals responsible.

4. Fraud and theft

Company property (machines, equipment, merchandise, facilities, fittings, etc.) and confidential information (sales figures, income statements, marketing plans, etc.) are intended exclusively for business use. Any other usage, for personal reasons in particular, is not permitted. All dishonest or fraudulent activity (fraud, misuse or theft of company property, falsification of expense accounts, etc.) is strictly prohibited.

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5. Equal opportunity

Our employees are evaluated solely according to their performance. Any discrimination based on race, religion, sex, lifestyle, political leanings, age, disability, sexual preference, or any other characteristic showing bias is unacceptable at Integris Composites. Any person who becomes a victim of such discrimination is encouraged to consult a trusted person.

6. Public statements

All employees of Integris Composites must refrain from making public statements that may be attributed to the company on issues or subjects for which the employee is not empowered as a spokesperson of the company. If necessary, the person making a statement must stipulate that they are speaking in a personal capacity and not on behalf of Integris Composites. Any statement that might harm the company is strictly forbidden.

If you have any questions, please contact your local Director of Human Resources. Any media requests for information must be transmitted to the Office of the General Counsel of Integris Composites for processing or transfer to the appropriate person within the company.

7. Environment

Integris Composites undertakes to rigorously comply with all applicable laws and regulations relating to environmental protection (see Environment Policy). The company also requires its employees to comply with the said laws and regulations.

III. Implementation of the Code of Conduct

1. Reporting system

Any natural person having knowledge of a crime or infraction, threat to the public interest, violation of the Code of Conduct, or, more broadly, of a legal violation (law, regulation, European Union law, etc.) that has occurred or which is very likely to occur within an entity of the company may report the said breach confidentially, orally or by email, to the local Director of Human Resources or to the person’s direct supervisor.

The report must be based on proven or truthful facts connected to the activities of Integris Composites. The natural person may report facts of which they have personal knowledge or facts reported to them in the course of their work.

For the report to be admissible and for the person making it to receive whistle-blower status, the report must be made in good faith and without any direct financial benefit.

The local Director of Human Resources may conduct or have others conduct inquiries based on the report while guaranteeing the confidentiality of the reporter.

For any questions relating to the Code of Conduct or to the reporting system, please contact your local Director of Human Resources.

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Local Director of Human Resources

Tel.:
Email:

2. Third-party evaluation process

Integris Composites pays special attention to the stakeholders with which it interacts (customers, suppliers, subcontractors, etc.).

It is important to identify risks pertaining to interactions with third parties by carrying out a detailed analysis in accordance with the established procedure to avoid forming any third-party contractual relationships that might cause harm to the company.

Consequently, Integris Composites reserves the right to not enter into or renew contracts, or to terminate any business relationship should the other party fail to uphold the requirements of the Code of Conduct, based on information obtained when evaluating the said party.

3. Implementation: responsibility and monitoring

Each employee is responsible for applying the Code of Conduct to their responsibilities and functions.

Each employee must adopt an ethical attitude and not hesitate to consult their supervisor or local Director of Human Resources for any questions relating to the application of the Code of Conduct or compliance with its principles.

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Acknowledgement of receipt

CODE OF CONDUCT

I have read the Code of Conduct and understand my obligations arising from it, and, as an employee, I undertake to comply with the rules of conduct described therein.

Surname, First name	Position
_____	_____
Signature	Date
_____	_____

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