

**lynx**eo

Wired to electrify industry

# Code of Ethics and Business Conduct



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# CEO STATEMENT

## ON LYNXEO'S CODE OF ETHICS AND BUSINESS CONDUCT



Lynxéo has embarked on a new journey, independent from the Nexans Group and backed by Latour Capital. This marks a pivotal moment in our history, one that opens the door to fresh opportunities and bold ambitions, as we continue to electrify the industries that move the world.

While much is evolving, our foundation remains unchanged. Across all the countries where we operate, the Lynxéo Group is united by a shared commitment to doing business with **integrity, reliability, responsibility, and respect**. These principles guide our decisions, shape our culture, and define how we engage with our people, customers, partners, and communities. Our commitment to excellence and integrity in the way we conduct our businesses is essential to securing Lynxéo's success and sustainable growth. Regardless of our role at Lynxéo, it is **what** we do **and** also **how** we do it that earns the trust of our colleagues, customers, partners, and stakeholders.

The Lynxéo Code of Ethics and Business Conduct must be our guide and reference for applying our ethical standards and core values.

Compliance with the Code is **everyone's responsibility and in all our interest** and there will be no tolerance for any violation. If you have any doubt or questions about what constitutes appropriate conduct, promptly discuss the issue with your manager or a member of the Legal & Compliance team prior to acting.

You can count on me, the Management Team, and our Shareholders to uphold this Code — and we count on each of you to do the same. By living our values and sharing our ethical commitments, we protect Lynxéo's reputation and our common success.



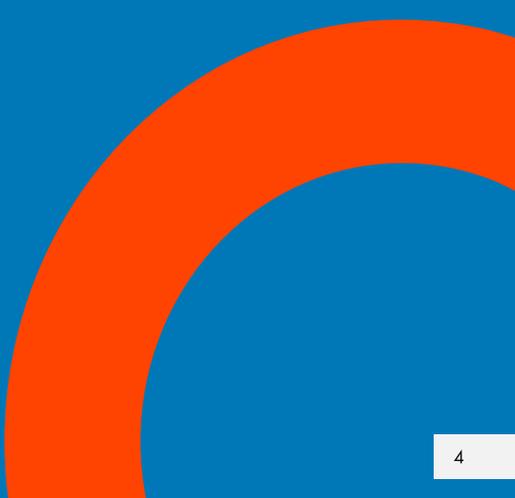
**Juan I. EYZAGUIRRE**  
CEO LYNXEO

A photograph of a wind farm at sunset. Two workers in safety gear are in the foreground, one pointing towards the turbines. The sky is a mix of orange and blue, with birds flying in the distance. A large yellow circle is on the left side of the image.

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# An Everyday Guide

A large, thick orange arc graphic that curves from the bottom right towards the center of the page.



This Lynxéo Code of Ethics and Business Conduct establishes the business principles applicable to all employees of the Group. The rules and guidelines it contains are the boundaries within which every Lynxéo employee must operate every day. This Code sets practical guidelines which supplement the rules, procedures and standards defined in your countries, which remain applicable.

## Compliance with laws: an absolute obligation



Compliance with the laws and regulations of the countries in which the Group operates is an obligation bearing no exception.

Any breach of the Code may trigger disciplinary sanctions and, in some cases, legal consequences such as fines and imprisonment.

This Code is designed to provide practical assistance and help us resolve the issues and dilemmas we may face in our work: How should certain customer or supplier requests be handled? How should we behave towards our colleagues? Are gifts or invitations that we intend to offer, or that we may receive considered acceptable?

As an employee of Lynxéo you also have an obligation to take certain trainings on topics highlighted in this Code.

The summary on page 2 provides a quick way to find the subjects which are covered.

That being said, it is not possible to address every single situation that could occur. If you are confronted with an issue of ethical or business conduct, ask yourself the following questions:

- *Is it legal?*
- *Does it comply with the Lynxéo Code of Ethics and Business Conduct?*
- *Am I certain of the appropriate conduct?*
- *Do I feel like I am making the right decision?*
- *What might people think if this became public?*

When in doubt, each of us must express our concerns and seek advice from management or the Legal & Compliance department. Information and relevant contacts are provided on the Lynxéo website and Intranet.

### **If you are a manager at Lynxéo, you have extended responsibilities with regard to this Code because:**

- You set the tone and lead by example.
- As a decision-maker you are likely to be more often confronted with matters that can be complex.
- Your team will come to you for assistance and advice. You must be able to respond accordingly or to direct them to the appropriate source of information.

Disciplinary sanctions for breach of ethics and compliance may be taken according to applicable local rules. They may include dismissal/termination.



# Human Rights Charter



Lynxéo is committed to respecting human rights as set out in the UN Universal Declaration of Human Rights and has adopted the following Human Rights Charter to materialize this commitment.

The Human Rights Charter outlines Lynxéo's commitment to respecting human rights through its policies and actions. As an integral part of the Lynxéo Code of Ethics and Business Conduct, this document underscores our core values: respect for all individuals, their diversity, dignity, and safety. Through this Charter, Lynxéo aims to demonstrate these principles across our entire value chain and within the communities where we operate. Additionally, we encourage all our suppliers to uphold and enforce these policies.

Our policy embraces and complies with global treaties such as the International Bill of Human Rights, the Universal Declaration of Human Rights and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work and other ILO Standards.

Lynxéo is a multi-national company, headquartered in France, where diligence on these topics is a legal obligation. The Lynxéo Human Rights Charter also complies with the laws and regulations of all the countries in which the Group operates. However, if these laws were to fall short of our commitments under our Code of Ethics, other company policies, or the standards set by this Charter, we would adhere to the highest human rights standards.

## Human Right Policy Governance

The Human Rights Charter is included in the Lynxeo Code of Ethics and Business Conduct, and its application is regularly followed up upon.

The Group's Code of Ethics and Business Conduct (including this Human Rights Charter) is presented to every new employee upon joining Lynxeo. It is also displayed on the Intranet sites of Lynxeo.



# 1. GLOBAL LABOUR STANDARDS



## A. LEGAL EMPLOYMENT

- The Human Resources function is responsible for the employment process.
- All Lynxéo employees receive an employment offer before they start working for the Group, with details on the job they are to perform, salary conditions and reference to reasonable notice periods.
- Each employee has access to information about their rights and obligations according to local legislation. Each member of the HR team and social partners are committed to supporting employees in order to obtain this information.
- When applicable under governmental regulations, employees in the Group are issued a work certificate when leaving the Company.



## B. CHILD LABOUR & YOUNG WORKERS

The Group ensures compliance with the legal working age set by local legislation and does not employ children under the age of 16. Apprenticeships may be carried out from the age of 16 respecting local legislation, as this professional experience is a pre-requisite for their education "on condition that the health, safety and morals of the young persons concerned are fully protected and that the young persons have received adequate specific instruction or vocational training in the relevant branch of activity" (article 3) – Minimum Age Convention.



## C. ELIMINATION OF ANY FORM OF FORCED OR BONDED LABOR

Lynxéo ensures the elimination of forced or bonded labour, prison labour and trafficking in persons within its direct and indirect operations. Lynxéo does not employ, directly or indirectly, employment agencies or firms involved in human trafficking, child labour or bonded labour. The Group expects that all its business partners also respect these principles.



#### D. SAFEGUARD OF FAIR REMUNERATION RIGHTS

- Lynxco guarantees the minimum wages set by local legislation and ensures regular payment to its employees.
- Lynxco abides by all local hiring and remuneration legislation and strives to ensure fair and equitable employment practices for all employees, at all hierarchical levels in the Group.



#### E. PROMOTING FAIR RECRUITMENT

- Recruitment at Lynxco responds to genuine labor market needs and is not used to replace or reduce the existing workforce, lower labor standards, wages, or working conditions, or otherwise compromise decent work.
- Lynxco has a Diversity & Inclusion Policy and other rules which uphold fairness, equity and non-discrimination in all people management processes, including recruitment.



#### F. TRAINING AND DEVELOPMENT

In order to develop the potential of each employee and to share best practices, Lynxco wants to provide its employees with access throughout their career to the training necessary for them to be able to perform their job properly and to ensure their Employability.

## 2. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

Lynxeo wishes to develop constructive relations with its employees and their representatives. We respect the right of employees to freely express themselves, form or join the unions and workers organizations of their choice and to participate in collective negotiations. We recognize the role and responsibilities of our employee representatives and are committed to communicating, negotiating and bargaining collectively with them to address matters of collective interest.





## 3. WORK CONDITIONS



### A. WORKING CONDITIONS AND HOURS OF WORK

- The Group complies with local legislation on working hours and ensures all employees have at least one day of rest per week, that break times are provided during working days and that the rate of pay for overtime is respected.
- The Group grants paid leave, sick leave and parental leave in accordance with local legislation.



### B. SECURITY

The Group does its utmost to ensure and provide employees with safe and secure working conditions.



### C. HARASSMENT

- Lynxeo is committed to creating and maintaining a work environment in which people (employees and third parties) are treated with dignity, decency and respect. We strive for an atmosphere of mutual trust, free from intimidation, oppression, exploitation and harassment (moral or sexual).
- The Group has a zero-tolerance policy towards any form of harassment, violence or intimidation against our employees by their peers, supervisors, customers or vendors.
- A whistle blowing system allows employees and third parties to anonymously report any improper behavior or conduct (for details refer to pages 39-41 below)
- Lynxeo promptly investigates all complaints of harassment and ensures swift and appropriate measures when applicable, and training where necessary.
- Lynxeo strictly prohibits retaliation against any employee who reports or files a complaint of discrimination or harassment.
- All employees are encouraged to take part in creating a workplace that is healthy, respectful, and supportive by standing up against harassment.



### D. HEALTH & SAFETY

- Lynxeo is committed to ensuring the safety of any person on site. Safety at work is based on the technical reliability of the facilities and equipment, as well as on employee training and the strength of the Group's Health & Safety culture. Lynxeo is committed to providing a safe working environment with limited risk and monitors and manages incidents and risks closely.
- We must all adhere to hygiene, health, and safety rules, and assist our colleagues, service providers, and anyone on site in doing the same.
- We are attentive to safety problems and ensure that our actions do not result in any risk for others or for ourselves.
- **Safety is an absolute priority for Lynxeo. Regardless of the degree of urgency, safety comes first.**
- Lynxeo engages in a transparent dialogue with employee representatives to secure occupational health and safety.

# 4. EQUAL OPPORTUNITIES



## A. NON-DISCRIMINATION RIGHT

- Lynxéo is dedicated to fostering an environment that ensures equal opportunities for everyone, creating a workplace where equality, respect, and consideration for one another are the norm. Our decisions regarding attraction, recruitment, development, compensation, termination, and working relationships are made to prevent discrimination based on (but not limited to) race, color, ethnicity, gender, origin, sexual orientation, age, disability, health condition, pregnancy, religion, marital status, or any civil, social, or political characteristics of the employee.



## B. DIVERSITY & INCLUSION

At Lynxéo, we recognize all the differences that make each employee valuable and unique. This diversity of experience, origin, personality, gender and disability is considered key to our global ambition to lead the world as an industrial champion towards a sustainable planet. We strive for an inclusive work environment where everyone can engage, speak up, flourish, and therefore contribute to our business results.

Our ambition is to build a team which represents the diversities of our customers, suppliers and communities in which we serve.

We expect all employees to understand and respect our Diversity & Inclusion guidelines, which include principles such as equity and equal access to opportunities. These principles must be embedded in all our activities and are everyone's responsibility. They allow the Group to attract and retain talented people and to create and develop a culture of collaboration at work.

The Group is committed to abolishing differences in perception related to gender, age, ethnic or social origin, disability, sexual orientation and other criteria of potential discrimination at work.



A young child with brown hair, wearing a dark blue jacket with yellow and green accents, stands in a field of yellow flowers. The child is holding two pinwheels, one blue and one yellow. In the background, several large wind turbines are visible against a clear blue sky.

## 5. LOCAL COMMUNITIES

Our responsibility is to be involved in communities:

- Lynxeo is committed to respecting the cultures, customs, and values of the people in the communities where it operates, as long as these do not conflict with our Code of Ethics and Business Conduct.
- Lynxeo, through its operations, contributes to the social and economic development in countries where it operates and pays particular attention to development opportunities for local communities.
- Lynxeo also respects the rights of communities by identifying, preventing and mitigating impact to the local environment and way of life.
- Lynxeo seeks to establish regular dialogue and lasting relationships with these communities.



## 6. DATA PRIVACY

Lynxéo is committed to protecting the personal data of our employees and business partners. It is therefore Lynxéo's policy to mitigate the risk of data breaches, data losses, or misuse.

Procedures and processes govern the use of personal information to meet the increasing expectations for privacy and data protection, including those of our business partners, notably in the Lynxéo General Management Procedures on Personal Data Protection.

# 7. BUSINESS PARTNERS

Lynxéo commits to respecting fundamental CSR principles in the areas of:



human rights and labour standards,



the environment



fight against corruption

wherever we operate and whoever we work with.

Lynxéo applies these principles not only within its own organization, but also expects its suppliers and sub-contractors to respect the same CSR principles.

Lynxéo assesses its CSR performance and also requests its key suppliers to provide their CSR scorecard. This ensures continuous improvement in terms of CSR performance. The CSR scorecard is issued by EcoVadis or other internationally-recognized CSR experts.



# 8. PRACTICAL IMPLEMENTATION



The principles listed in the present Charter are to be implemented by all Lynxeo Group entities. The respect of such principles is monitored through various Key Performance Indicators (KPIs) and processes:

All newly hired employees who have an individual professional computer must complete an Ethics & Compliance training as part of their compulsory onboarding course. This training highlights that Lynxeo upholds the highest level of integrity in all the countries it operates.

- All top executives, managers and key personnel throughout the Group must complete the Compliance Week course every year. This course contains reminders and updated on ethics & compliance rules, and encourages everyone, whether potential victim or witness, to report any suspicion or violation through the whistleblowing tool.
- Signature of the Lynxeo Supplier CSR Charter
- Thorough due diligence is conducted before contracting with sales intermediaries.
- An audit team controls the safety at work and human rights aspects in the framework of audits performed.
- Regular assessment of Lynxeo's CSR performance

*Sanction: this Charter contains fundamental principles for the protection of basic human rights. Hence, any willful violation of the above principles, or any breach which is not remedied, will trigger disciplinary sanctions up to dismissal, and in some cases legal consequences such as fines and imprisonment.*

# Fighting corrupt practices



Lynxeo Group wishes to make a positive contribution to the countries, business sectors and communities in which it operates.

Lynxeo does therefore not tolerate corruption, which undermines fairness, trust, and progress at every level of society. Lynxeo is committed to showing transparency in its transactions and lobbying practices.



## BRIBERY AND CORRUPTION

Bribery and corruption is prohibited in numerous countries and incompatible with the ethics of Lynxeo. The violation of anti-corruption laws is sanctioned notably by heavy fines for companies and prison sentences for individuals.

### ACTIVE CORRUPTION

None of us must offer, promise, or give **anything of value** — such as money, gifts, or favors — to a **public official or private individual in order to influence their actions or decisions** in their **official duties**. Such actions must also not be carried out on our behalf by intermediaries, including agents, freight forwarders, brokers, or any other third parties.

Lynxeo does not tolerate facilitation payments, which are small, unofficial payments made to a public official to speed up or secure the performance of a routine or necessary action.

In some legal systems, simply turning a blind eye on suspicions of bribery and corruption can result in liability for Lynxeo and for each person involved. So, let's all be vigilant to prevent corruption in our business.

### PASSIVE CORRUPTION

None of us must directly or through an intermediary, **request or receive** gifts, promises or undue advantages of any kind whatsoever, for ourselves or to the benefit of a third party, **to act or refrain from acting in the exercise of our functions at Lynxeo, or to grant an advantage or favor to a third party thanks to our position at Lynxeo.**



## GIFTS AND INVITATIONS

Offering or accepting gifts or invitations may be legitimate and part of the normal way of doing business. However, under certain circumstances, such gifts and invitations may constitute bribery. This is the case when the ultimate purpose is to influence a person to do or not do something in violation of their legal, contractual or professional obligations. We may not offer/give or request/accept such gifts or favors.

**When we offer gifts or extend invitations, we must remain within the reasonable limits (generally not more than EUR 100) and intervals. When dealing with Public Officials extra caution is required and stricter limits may apply.**

Likewise, Lynxéo discourages its employees from accepting gifts and invitations from business partners. Group policy sets the acceptable value for receiving gifts or hospitality at EUR 100. Stricter rules may apply locally.

We may never make or accept gifts in cash. More detailed guidance is available in the Gifts & Invitations Policy. When in doubt, discuss it with your manager.



## INFLUENCE PEDDLING

Lynxéo employees must not solicit a person who has, or claims to have, influence on the decision-making of a public official, in order to obtain, through the improper influence of such person, an undue advantage from a public official, to the benefit of Lynxéo.

Any request, receipt or the acceptance of the offer or the promise to use such improper influence is prohibited, whether or not the influence is exerted or whether or not the supposed influence leads to the intended result.

The difference between trading in influence and bribery is that, for influence peddling, the recipient of the advantage is not the decision-maker/official and the latter may not even be aware of the illicit solicitation.

Conversely, it is also prohibited for Lynxéo employees to uphold themselves as someone close to power and to offer to Lynxéo's commercial partners to exert improper influence on public officials in their favor, to obtain undue advantages of any type whatsoever.





## CONFLICTS OF INTEREST

A conflict of interest can arise when social, economic or political activities of employees, or those close to them, influence or could influence their objectivity and loyalty to Lynxéo.

Working in a position or function or holding a financial interest in a competing organization, customer, supplier or commercial partner of Lynxéo, when your duties within Lynxéo allow you to have an influence over this relationship, constitutes a conflict of interest.

You must avoid conflicts of interest as your decisions at Lynxéo shall not be influenced by personal or private considerations.

If you find yourself in a situation that **could** constitute a conflict of interest or give the impression of influencing your judgment and actions, you **must** disclose it. There is a dedicated process available online in your personal profile. You may also inform your line manager in writing if you do not have access to the intranet. Your disclosure will be assessed by your line manager, if required with support from your human resources or the legal team. Pending the conclusion of the assessment, you should withdraw from decision-making that creates or could be perceived to create a conflict of interest.



## POLITICALLY EXPOSED PERSONS (PEP)

Any Lynxéo employee who could be perceived as « politically exposed » must disclose it to his / her line manager as well as through the Lynxéo intranet process for employees who have a personal online profile.

Any Lynxéo employee who meets the criteria outlined below shall be classified as a Politically Exposed Person:

- has or has been entrusted with prominent political, governmental, military, judicial or administrative function or held a senior executive functions within a state-owned corporation or important political party, whichever the country ;

or

- of whom a business associate, an immediate family member or close friend holds or has held such a position.

Your disclosure will lead to an internal assessment of your position by your line manager your human resources manager and / or the legal / compliance team to determine if you are, indeed, deemed politically exposed. In such case, it will be assessed whether your personal situation may have an influence on your functions within Lynxéo. If so, specific remediation measures will be implemented, such as a confidentiality ring, dual decision-making process, reallocation within the Group to a position at least equivalent.



## POLITICAL ACTIVITIES

The general policy of Lynxco is that we do not make contributions to political parties, organizations or committees. In any event, any payment made must comply with any applicable law and must be approved by the Lynxco General Counsel.

The Group respects the right of its employees to participate in political activities personally as long as it is clear that they do not represent the company or act on its behalf. Employees must not engage in political activities during work hours or use the company's resources.



## COMMUNITY RELATIONS

Lynxco supports a dialogue with communities and representatives of civil society.

Support for local initiatives in favor of solidarity, health, education, economic and social development, the environment, culture and sports is the responsibility of each entity and must comply with applicable rules on sponsoring. They require the approval of the Head of Business Unit.



## MONEY LAUNDERING PREVENTION

Money laundering occurs when the illicit origin or nature of money or assets is covered up by legitimate business dealings. The opposite, which consists in the use of legitimate funds to support illicit activities (including the financing of terrorism or counterfeiting) is also prohibited.

Lynxco undertakes to comply with all international laws on money laundering and financing of illegal activities. The Group only deals with customers whose commercial activities and sources of funding are legal, in line with Group rules.

Each company of the Group implements customer identification and due diligence procedures.

Each of us must be vigilant with regard to orders or unusual payments, particularly complex exchange structures and fund transfers to or from countries unrelated to the transaction or tax havens.

The logo for lynxéo, with 'lyn' in white, 'x' in orange, and 'éo' in white.

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# Fair competition





Lynxco is committed to loyal and open competition in strict compliance with antitrust laws. These laws apply to every level of business. Lynxco does not tolerate any breach to antitrust laws. Antitrust and competition laws prohibit competitors from entering into any form of agreement, from concerted action, whether express or tacit understanding or collusive action that may have as their object or effect the restriction of free competition. Such violations can give rise to severe civil and criminal penalties, which can apply to private individuals in addition to legal entities.

Each of us must be very careful not to maintain relations with competitors, even informal ones, as they may be qualified as an illegal agreement or arrangement.

In particular, Lynxco employees must not participate in:



- price-fixing arrangements,
- market sharing or customer allocation,
- production restrictions or sales quota agreements,
- bid-rigging with other companies replying to a tender,
- unfair trade practices,
- arrangements or agreements to exclude a competitor from the market or to restrict market access for new competitors through unlawful means.

Details are provided in the General Management Procedure “Lynxco Antitrust Guidelines” and in the Guidelines for situations in which (potential) competitors are also our distributors/clients, or our suppliers.

When in doubt, the Legal Department should be consulted early enough and prior to acting to avoid any risk of non-compliance.



# Export control and trade sanctions





It is Lynxeo's policy to ensure that its worldwide trade operations comply with export and import control laws and with regulations establishing trade sanctions and embargoes ("trade regulations").

Before exporting or importing a product, software, technology, or any related document, its **category and classification** must be verified in order to determine whether special authorization is necessary. A background check must similarly be run on all our commercial and financial partners to ensure that they do not appear on lists of entities or individuals under sanction.

Non-compliance with trade regulations may expose Lynxeo to legal charges, financial penalties, and operational disruptions, including difficulties in obtaining licenses, the risk of being blacklisted by government authorities, interruptions or termination of relationships with banks and suppliers, and travel restrictions.

For Lynxeo employees, such failure can result in serious consequences including fines and/or imprisonment.

Accordingly, it is the responsibility of all Lynxeo employees to know and follow the applicable Trade Regulations. Please also consult the applicable Export Control Guidelines for more details.

# Our commercial partners





To build solid, long-lasting relationships, Lynxeo is committed to honesty, trust and mutual interest with its customers, suppliers and subcontractors. Commitments to third parties are made by duly authorized employees.

We respect both the tangible and intangible property rights of our commercial partners, particularly regarding any items entrusted to us.

We are committed to preserving the confidentiality of all information shared with us..

We manage the personal data of our commercial partners responsibly and in compliance with the laws governing privacy protection.



## CUSTOMER RELATIONS

Lynxeo treats its customers with integrity and fairness whatever their size.

We are committed to promoting our products and services in a manner that is honest and fair. We ensure that any statements, communications and presentations that we make are accurate and reliable.



## AGENTS, CONSULTANTS, DISTRIBUTORS

Relationships with these third parties are valuable but bear specific risks. They require particular scrutiny and may only be signed when appropriate due diligence has been completed and all required approvals have been obtained. The execution of the contracts are also monitored.

We require our agents, consultants, distributors and Business Partners to commit to comply with business and ethics rules, particularly with regard to anti-bribery laws, comply with competition laws and import and export control regulations.

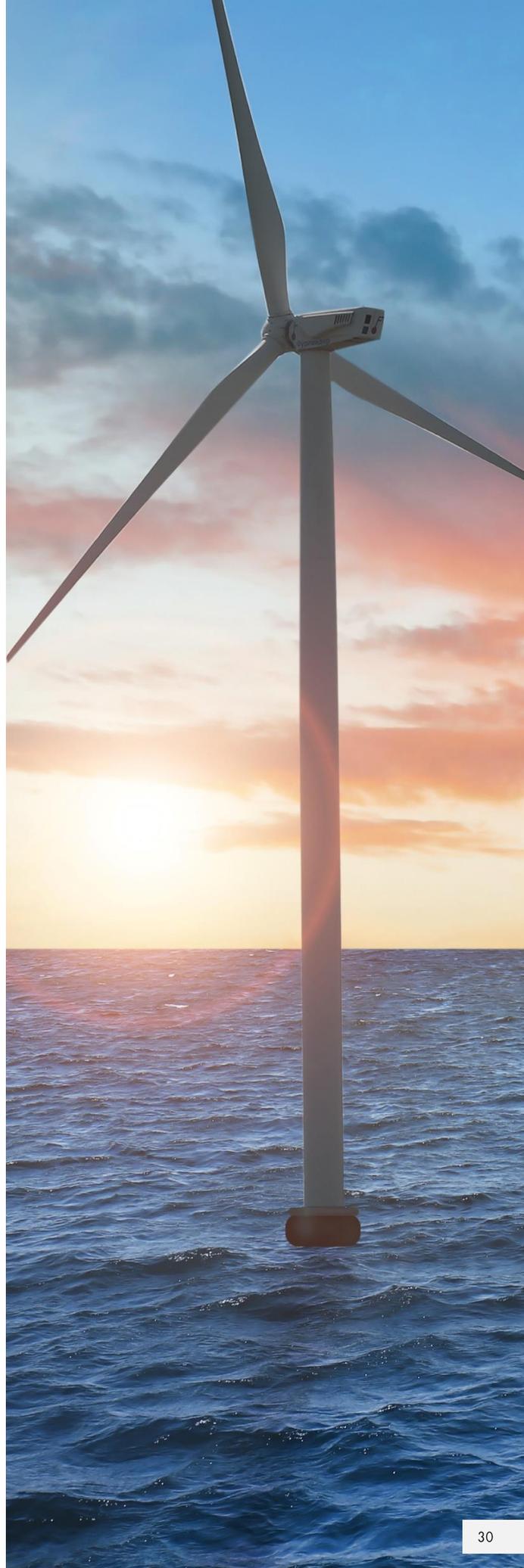


## SUPPLIER AND SUBCONTRACTOR RELATIONS

We are judged on the quality of the relationships that we maintain with our suppliers. In particular, our customers evaluate us on the basis of our selection criteria as well as the commitment of our suppliers to conduct their business responsibly.

We select suppliers through open and competitive invitations to tender. We must ensure that all tenders are given equal consideration.

Through the signature of our CSR Supplier Charter, we request our suppliers to share our commitments, particularly with regard to labor conditions, respect for human rights and respect for the environment.





# Accuracy of business information



Lynxco complies with strict standards in respect of corporate governance, internal control and risk management.

## ACCURACY AND COMPLETENESS OF FINANCIAL AND OTHER BUSINESS DATA



It is essential that all financial, legal, economic, industrial, commercial, social and environmental information provided is accurate and not misleading. This ensures compliance with our legal obligations, particularly towards our shareholders, financing banks, our partners and the authorities. It also preserves the credibility and reputation of our Group.

All obligations, procedures and guidelines laid down by our legal entities with respect to internal reporting and the recording, safeguarding and archiving of information, must be complied with.

We must ensure that all transactions and operations are recorded accurately and in full detail and we must cooperate fully with the internal and external auditors responsible for verifying them.

When in doubt, you should share your questions, seek advice, and, if necessary, immediately report any irregularity or violation of these rules to your manager or the Group's Legal Department.

Falsifying a document or creating misleading information constitutes fraud. Lynxco does not tolerate fraud of any kind. All our data must accurately reflect the relevant situation, operation and transaction.



# Environment & Product Responsibility



Lynxeo is committed to minimizing the impact on the environment of its activities and its products and offering solutions contributing positively to the global environmental and energy issues (rise of energy demand, increase in mobility needs, climate change, urbanization, resources scarcity, etc.). The Group is committed to ensuring the safety of installers, operators and users of infrastructures, buildings, means of transport, equipment and machines equipped with its cables and cabling systems.



## PROTECTION OF THE ENVIRONMENT

Regardless of where we operate, we strive to reduce the impact of our activities on the environment through

- risk and accident prevention measures,
- by controlling our direct and indirect consumption and emissions
- by decreasing, treating, and recycling our waste and managing our pollution risks.

We must each make our own contribution according to our function by:

- the strict application of all regulatory obligations as well as Group obligations regarding the environment,
- taking all necessary measures to implement the Group's environmental management system and contributing to improving the results,
- participating in energy saving programs and reducing consumption through raw materials programs, and managing pollution risks (prevention and control).





## PRODUCT RESPONSIBILITY

The trust of our customers is based primarily on the quality and safety of our products. We must all contribute to this. Each of us, depending on our responsibilities, must:

- abide by regulatory and internal standards, favoring the most demanding ones in terms of safety,
- ensure the strict application of quality controls at each stage of production; quickly report and react to any quality problem in order to correct it,
- ensure that the technical documentation and installation and safety instructions that accompany our products are perfectly clear and accurate to prevent any risk of accidents,
- take into account all safety or quality problems reported by installers and customers.

We work closely with our customers to develop sustainable cabling solutions to transport energies and data efficiently and safely. Lynxéo aims to improve the quality of life of all the final users.

We strive to satisfy our customers to the extent possible by providing them with accurate information about the composition of our products and their environmental impact throughout the life cycle. We provide them with solutions for handling and recycling their end-of-life cables.



Safeguarding  
information and  
assets



Lynxeo respects the private life of its employees and does not interfere in their conduct outside the workplace.



## PROTECTION OF COMPANY RESOURCES

We must all act with integrity, vigilance and common sense to ensure that the Group's resources and opportunities are not misappropriated, wasted, lost, damaged, misused, stolen or infringed. These resources include work time, intangible assets and confidential information.

All equipment, information, ideas and data that you use or to which you have access in your work belong to the Group or its partners. Unless specifically permitted otherwise, the Group's resources must be used solely for professional purposes. The same is true for opportunities identified as part of your duties.



## COMPLIANCE WITH CONFIDENTIALITY RULES

Intellectual property, industrial know-how, strategic analyses and plans, financial, technical and commercial information and all confidential information are highly valuable assets, and the Group could suffer considerable damage if they were disclosed without authorization.

All confidential information, and particularly data regarding customers and suppliers, must be kept secure and returned upon departure from the Group.

We must avoid discussing or working on confidential information in public places where conversations can be overheard and the safety of the data can be compromised.



## THIRD PARTY'S INTELLECTUAL PROPERTY

The Group respects the intellectual property and protected information of third parties.

Confidential information belonging to a third party can only be used under an agreement approved by the Legal Department.

The loading of unlicensed software on to the Group's computers is prohibited.

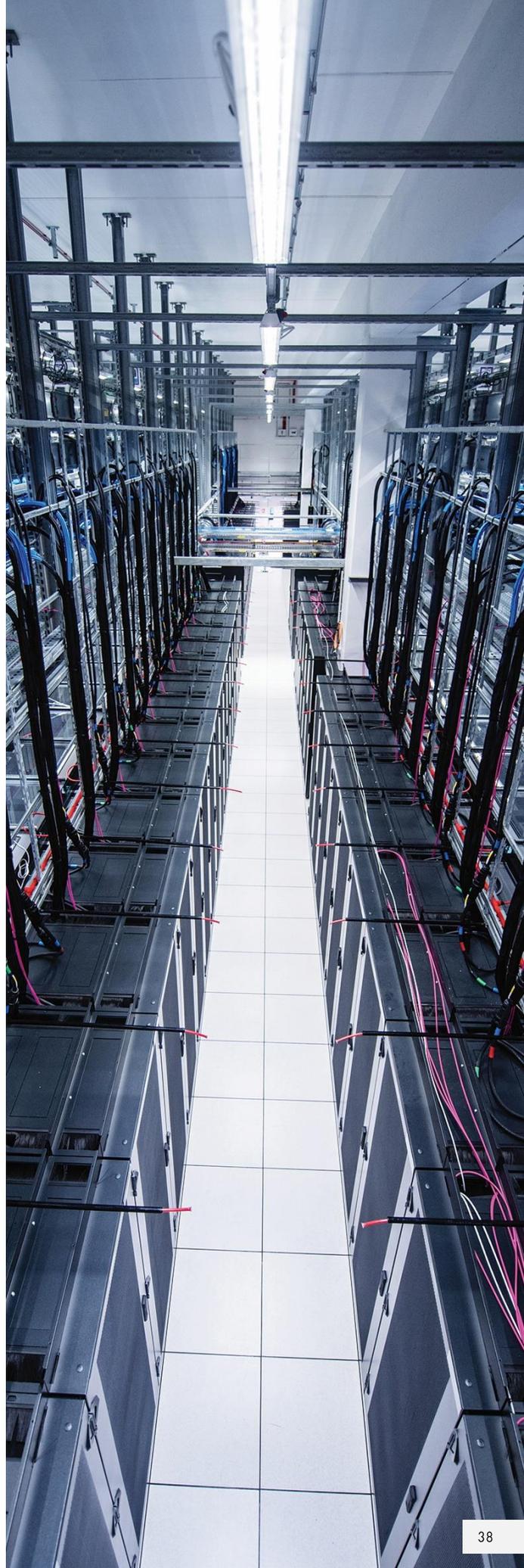


## PROTECTION OF PERSONAL DATA

The loss or misuse of personal data may bear substantial adverse consequences for individuals concerned. Fully aware of its responsibility, Lynxeo Group and its employees are committed to protecting personal data of employees, clients and any third party. In addition, Lynxeo commits to protecting the enforcement of rights by such individuals pursuant to the European Union Data Protection Regulation ("GDPR") and applicable national or local laws and regulations.

In this framework, Lynxeo collects and processes personal data for legitimate purposes only and ensures, through appropriate technical and organization measures, that such data is protected against loss, modification, misuse or unauthorized disclosure.

To this end, Lynxeo has issued a « Personal Data Protection Policy » which applies to all Group entities worldwide and establishes principles and guidelines that shall govern data processing, in particular for those employees whose functions within the Group may involve personal data processing.



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# Whistleblowing system



Any Lynxeo employee, but also any client, supplier, sub-contractor and more generally, any third party, may report a compliance breach directly to the Group General Counsel and Compliance Officer through the online whistleblowing system made available by the Group (phone line available as well), which can be found under the following address:

<https://lynxeo.speakup.report/en-GB/Lynxeo/home>



Full details on how an alert can be made and how an alert is processed by Lynxeo are provided on the company's website.

The alert may be made anonymously and in many languages.

Group employees may also use other existing reporting channels in the Group such as hierarchical management and Human Resources contacts.



## WHICH INCIDENTS SHOULD BE REPORTED?

Incident reporting may be made for the following matters covered by the Code of Ethics and Business Conduct:

- accounting irregularities;
- financial and banking irregularities;
- any case of corruption or influence peddling, whether potential or effective;
- fraud;
- conflict of interest situations;
- violation of competition law;
- harassment and discrimination at work;
- violation of health, safety and hygiene regulations at work;

- child labor;
- infringement of the right of employees to form or join the unions of their choice and to participate in collective negotiations;
- violation of human rights;
- disregard for the environment or any other breach to the Corporate Duty of Vigilance;
- violation of confidential information and Group's intellectual property;

Each incident report will be treated with the highest degree of confidentiality and in line with a clearly defined process that preserves the confidentiality of the person making the incident report as well as all personal confidential data as they are collected, communicated and stored.

Lynxio guarantees that the good-faith use of this procedure in compliance with local applicable law will not expose the reporting individual to any sanction even if the facts are not conclusive or do not lead to any investigation or sanction. However, abuse of this procedure for malicious or defamatory purposes may result in disciplinary sanctions and/or even prosecution.

In case of any uncertainty or doubt regarding the interpretation of any clauses of this Code, you may consult your direct manager, the Human Resources Department or the Legal Department



## POSSIBILITY TO REMAIN ANONYMOUS

Anonymous incident reports must be sufficiently detailed and contain enough material information to allow for effective and appropriate investigation.





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Referenced documents and further information on Legal & Compliance at Lynxéo can be found:

- through the landing page of the Lynxéo Intranet and [here](#)
- on the Internet <https://lynxeogroup.com>