PRECIA
Anti-Corruption code of conduct

PREAMBLE

With regard to the fight against corruption and influence peddling, PRECIA Group adopted the Middlenext anti-corruption code of conduct, the content of which is included hereinafter (hereinafter referred to as the "Code").

This Code targets all forms of corruption and forms an integral part of the internal regulations of each PRECIA Group entity.

Insofar as all cases of corruption and influence peddling that may arise in the course of the Group's daily activities cannot be addressed in a comprehensive manner, it is up to each person to exercise their own judgement and to use common sense in all situations. If in doubt about the conduct to adopt, PRECIA has put in place help and advice tools to rely on, as well as an internal whistleblowing system.

This Code may be revised.

1 Framework and Scope

This Code applies to all PRECIA Group employees.

Each employee must adopt exemplary behaviour within PRECIA Group and refrain from breaching the rules of conduct defined under this Code.

Any questions from an employee about the application or interpretation of the Code should be directed to their line manager or the contact person(s) appointed by PRECIA Group.

2 Basic Rules and Variations

CORRUPTION AND INFLUENCE PEDDLING

DEFINITIONS

CORRUPTION is a behaviour by which a person (public official or private person), either directly or through intermediaries, offers, requests or accepts a donation, offer, promise, gifts or advantages of any kind with a view to performing, delaying or omitting to perform an act which enters either directly or indirectly within the scope of their duties, in order to obtain or retain a business or financial advantage, or to influence a decision.

There are two types of corruption: active corruption and passive corruption. The difference between active and passive corruption lies in the role taken on by the person committing an act of corruption.

Corruption is **active** when the corrupting person initiated the act of corruption.

Examples:

- A PRECIA Group employee offers an undue advantage (sum of money, kickback, hospitality, service, etc.) to a private customer or prospect, in order to secure a contract or order with said customer or prospect.
- PRECIA Group employee offers an undue advantage (sum of money, hospitality, service, etc.) to an engineering firm in exchange for amending the terms and conditions for obtaining a public tender or modifying specifications in favour of PRECIA products.

Corruption is **passive** when the act of corruption is initiated by the corrupted person, i.e. the person who performs or fails to perform an act in exchange for compensation.

Examples:

- A supplier of technical products (example: electronic boards) or raw materials on which PRECIA depends requests an undue advantage (sum of money, hospitality, service, etc.) in exchange for securing PRECIA's procurement.
- A customer offers an undue advantage (sum of money, hospitality, service, etc.) to a PRECIA Group employee in order to obtain a discount rate above the maximum rate provided for in their discount grid.
- A sales representative asks a PRECIA Group employee for a high commission rate in exchange for an undue advantage (sum of money, kickback, hospitality, service, etc.).

Corruption may take several forms under the guise of common business and social practises, such as invitations, gifts, sponsorship, donations, etc.

INFLUENCE PEDDLING refers to a person who monetises their position or influence, whether actual or alleged, to weigh in on a decision to be made by a third party.

It involves three actors: the beneficiary (the person who provides benefits or donations), the intermediary (the person who uses their influence due to their position) and the target person who holds the decision-making power (authority or public administration, magistrate, expert, etc.).

RULES AND PRINCIPLE

PRECIA Group employees must not commit any acts of corruption, nor use any intermediaries, such as agents, consultants, advisers, distributors or any other business partners, for the purpose of committing such acts.

If a PRECIA Group employee is confronted with a proposal, they should ask themselves:

- Does it comply with laws and regulations?
- Is it in line with the Code and the interests of PRECIA Group?
- Is this without personal interest?
- Would I be embarrassed if my decision was communicated?

PRECIA Group **has defined a procedure** to ensure each employee can express their doubts, whenever they are faced with an ethical or business conduct choice, in full confidentiality. This procedure is available in particular on the Group intranet and here

To summarise, for any information, enquiries or advice in this regard, each PRECIA Group employee can contact:

- their line manager
- the ethics officers, at the following email address: ethic-contact@preciamolen.com

SPECIFIC RULES FOR PUBLIC OFFICIALS

DEFINITIONS

The term "PUBLIC OFFICIAL" refers to a person who is a custodian of the public authority, entrusted with a public service mission or who holds an elected public mandate, either for themselves or for others.

Examples:

- A certification and/or authorisation body requests an undue advantage (sum of money, hospitality, service, etc.) from a PRECIA employee in exchange for the certification of measuring instruments.
- A PRECIA Group employee agrees to grant an undue advantage (sum of money, hospitality, service, etc.) to a representative of a control body in order to modify findings detrimental to PRECIA.

RULES AND PRINCIPLE

Corruption of public officials is subject to more severe sanctions[1].

[1] The French Criminal Code heavily sanctions individuals guilty of public corruption – sentences of up to 10 years in prison and 1 million euro in fines. The mere attempt – for example, offering a bribe or asking for it – is sanctioned in the same way as the act of corruption committed.

Any relationship with a public official must comply with the applicable regulations. Unless prohibited by law, any advantage granted to a public official must be fully transparent and subject to prior authorisation from the PRECIA Group hierarchy.

GIFTS AND HOSPITALITY

DEFINITIONS

GIFTS are advantages of all kinds given by someone as a sign of appreciation or friendship, without expecting anything in return.

Offering or receiving meals, accommodation and entertainment (shows, concerts, sporting events, etc.), in particular, is considered as HOSPITALITY.

RULES AND PRINCIPLE

Gifts and hospitality may appear or be perceived as an active or passive act of corruption, so caution should be taken with gifts, courtesies and hospitality (whether received or given) and invitations to entertainment, which contribute to good relationships, but can also be seen as a means of influencing a decision, as well as favouring a company or individual.

Gifts, invitations and hospitality must meet several conditions to be permitted:

- ✓ Be given or received for a legitimate business purpose; they must never be intended to obtain or offer an undue advantage or influence a decision, or give the appearance of such a purpose;

Example:

  - o If you are participating in a tender selection process, you are not allowed to offer any gift or hospitality

- ✓ Whether offered or received, they must comply with the PRECIA charter on gifts and hospitality, the applicable anti-corruption and influence peddling laws, as well as all other laws and regulations in force;

- ✓ Whether given or received, they must be socially acceptable:

  1) Be occasional

  2) Be of a reasonable nature and value

  3) Without any impact on the reputation of PRECIA Group.

Example:

  - o Inviting a customer to dine at a famous restaurant in Paris to celebrate the New Year does not meet these conditions.

CHARITABLE OR POLITICAL DONATIONS

DEFINITIONS

DONATIONS AND CONTRIBUTIONS are advantages given in the form of money and/or contributions in kind; they are allocated for a specific purpose: research, training, the environment (sustainable development), charitable or humanitarian purposes, etc.

Political contributions – whether monetary or not – are intended to support political parties, leaders or initiatives.

RULES AND PRINCIPLE

Requests for gifts, donations or contributions must be considered with caution, in particular those from persons in a position to influence PRECIA Group's activities, or who could derive a personal advantage from them if the donation was granted.

Donation requests must be approved by a line manager.

PATRONAGE AND SPONSORSHIP

DEFINITIONS

Through PATRONAGE AND SPONSORSHIP, the company wishes to provide financial or material support to a charity, social, cultural or sporting action, in order to communicate and promote its values.

RULES AND PRINCIPLES

Patronage and sponsorship must be carried out without seeking specific advantages from the beneficiary other than promoting the image of PRECIA Group.

FACILITATION PAYMENTS

DEFINITION

FACILITATION PAYMENTS are unofficial payments (as opposed to legitimate and official duties and taxes) made to facilitate or speed up any formalities, including administrative, such as applications for permits, visas, customs clearances, etc.

Example:

- A PRECIA Group employee agrees to grant a facilitation payment to a representative of a certification and/or authorisation body in order to speed up the issue of a licence and/or authorisation.

RULES AND PRINCIPLE

PRECIA Group does not accept “facilitation payments” except for compelling reasons (health and/or safety of an employee, etc.).

MONITORING OF THIRD PARTIES (SUPPLIERS, SERVICE PROVIDERS, CUSTOMERS)

DEFINITION

Monitoring concerns THIRD PARTIES, whether natural or legal persons, with whom the company interacts and who may in certain cases present a particular level of risk in terms of corruption.

The following are considered as third parties: business partners, suppliers, service providers, agents, customers, intermediaries, etc.

RULES AND PRINCIPLE

PRECIA Group is committed to ensuring third parties respect its principles and values and to carrying out appropriate due diligence, whenever necessary.

CONFLICTS OF INTEREST

DEFINITION

CONFLICTS OF INTEREST arise from any situation in which employees' personal interests conflict with their functions or responsibilities.

Example:

- A PRECIA Group employee promotes the selection of a supplier in which they have a personal and/or financial interest (relative or ally holding an executive position within the supplier company).

RULES AND PRINCIPLE

If circumstances give rise to a potential or actual conflict of interest, the PRECIA Group employees concerned must report it in accordance with the procedure set out in this Code.

ACCOUNTING RECORDS/INTERNAL CONTROLS

DEFINITION

The company must ensure its accounting departments and/or internal and/or external auditors are attentive to any acts of corruption that may be concealed in the books, records and accounts, during their audits.

RULES AND PRINCIPLE

PRECIA Group employees working on accounting control missions (audits, account certification) must pay special attention to the accuracy and honesty of the accounts.

Implementation

TRAINING

PRECIA Group employees are required to read this Code and participate in training sessions organised by PRECIA Group, in order to raise their awareness of the fight against corruption. New employees are made aware of this from their first day of employment.

REPORTING NON-COMPLIANT PRACTICES AND WHISTLEBLOWER PROTECTION

In compliance with the procedure defined by PRECIA Group, each PRECIA Group employee may express their doubts and/or ask their questions to their line manager and/or ethics officer:

- ✓ If they are confronted with a corruption risk;
- ✓ If they believe in good faith that a violation of the Code has been, is being or may be committed;
- ✓ If they discover that someone is being subjected to retaliations for making a report in good faith.

Any PRECIA Group employee who reports an actual or potential violation of this Code to their hierarchy or the ethics officer, in good faith and in a disinterested manner - i.e. sincerely believing that their statement is correct, will be protected against any form of retaliation. Their identity along with the facts will be treated confidentially, as per the applicable regulations.

Furthermore, if an error is made in good faith, this will not result in any disciplinary action, whereas any deliberately abusive allegations or marked by a willingness to harm will be punishable by sanctions.

WHISTLEBLOWING SYSTEMS AND PERSONAL DATA PROTECTION

Employees are informed of the existence of PRECIA Group's internal whistleblowing system.

More specifically, this system is available through the Group intranet:

PRECIA whistleblowing system here

In accordance with the regulation applicable to personal data protection in force in most countries in which PRECIA Group is present and, in particular, within the European Union, any person identified as part of a whistleblowing system, whether

they are the whistleblower or the subject of the whistleblowing, may exercise their right to access the data concerning them.

Anyone may also request to rectify or delete their personal data if it is inaccurate, incomplete, ambiguous or outdated, in accordance with the same procedures.

SANCTIONS FOR VIOLATING THIS CODE

The employee shall be held liable for any violation of these rules, which exposes them to sanctions, including criminal[2], under the applicable legislations.

PRECIA Group undertakes to:

- ✓ Take all declarations into account;
- ✓ Investigate alerts with due diligence;
- ✓ Evaluate facts objectively and impartially;
- ✓ Take appropriate corrective measures and disciplinary actions.

IMPLEMENTATION: ACCOUNTABILITY AND MONITORING

Each PRECIA Group employee is responsible for enforcing this Code within the framework of the responsibilities relating to their position.

PRECIA Group carries out periodical audits to check compliance with the practices.

PRECIA Group's governing bodies regularly reviews the implementation and follow-up given to alerts.

Veyras, 3 May 2024

Frédéric MEY

Chairman of the Management Board

[2] French Law criminalises active corruption (the corruptor) and passive corruption (the corrupt) in the same way. In the private sector: For a natural person, the maximum penalty is 5 years imprisonment and a €500,000 fine (the amount of which may be increased to twice the amount gained through the offence). For a legal person, the maximum penalty is five times the fine for natural persons