

2023

Code of Ethics & Conduct



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Management's commitment

Lebronze alloys is a world leader in high-speciality copper metallurgy, whose raison d'être, enshrined in our articles of association, is to:

"Consolidate expertise in the production and recycling of mainly copper- and nickel-based metal alloys to provide a responsible response to the technical and environmental challenges faced by user industries."

At Lba, responding responsibly means implementing a "B.R.O.N.Z.E" sustainable development policy, which sets out the Sustainable Development Goals (SDGs) that we have set ourselves as part of our membership of the United Nations Global Compact, in 6 principles.

The Group's sustainable growth is based on the commitment of all our employees and on the trust of our partners. We must therefore constantly earn that trust by implementing the best ethical and behavioural practices set out in this Code of Conduct, the principles of which should guide you in your day-to-day actions.

The entire Executive Committee is committed to working alongside me to ensure the strictest compliance with this Code of Ethics and Conduct, and zero tolerance will be applied, particularly in the area of corruption.





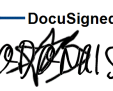

I am counting on each and every one of you to promote it and to act in all circumstances in accordance with its instructions.

Michel Dumont,
Chairman LBA SAS



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THE EXECUTIVE COMMITTEE

Alexandra Dumont	Didier Pitot	Alban Didier	Stephane Godonaise	Albert Bruneau	Cyrille Heibst
Managing Director	Director of Strategy and Development	Chief Financial Officer	BU Director Bars & Design	BU Director Rolled Product & Arcap	BU Director Rods & Wire
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Introduction: objective and scope of the code

The objective of the Group's "**Code of Ethics and Conduct**" is to set out the principles and commitments that guide Lba's actions in its internal and external relations.

The Code also sets out expectations for employees in their day-to-day decision-making and in their relationships with all stakeholders by ensuring that they comply at all times with the 10 principles of the United Nations Global Compact, to which Lebronze alloys SAS has been a signatory since 2017.

- ① Support and respect the protection of internationally proclaimed human rights.
- ② Make sure you are not complicit in human rights abuses.
- ③ Respect freedom of association and recognise the right to collective bargaining.
- ④ Contribute to the elimination of all forms of forced or compulsory labour.
- ⑤ Contribute to the effective abolition of child labour.
- ⑥ Contribute to the elimination of all discrimination in respect of employment and occupation.
- ⑦ Apply the precautionary approach to environmental challenges.
- ⑧ Undertake initiatives to promote greater environmental responsibility.
- ⑨ Encourage the development and diffusion of environmentally-friendly technologies.
- ⑩ Work against corruption in all its forms, including extortion and bribery.

The "**Code of Ethics and Conduct**" is therefore the reference document for each and every employee – hereinafter referred to collectively as "employees". All new employees will receive this document when they sign their employment contract.

A specific "**Supplier Code of Conduct**" is also available on our website, but we encourage all players in the Group's value chain to strengthen their commitments in terms of sustainable development.

Attached is a reminder of the Alert procedure available in the event of a breach of this Code of Ethics and Conduct, which is also available on our website.

WE SUPPORT



Lba undertakes to comply with national and international laws and standards and to respect human rights

Our Group's reputation for integrity is built on respect for the laws, regulations and other obligations in force, wherever our Group operates.

Lba undertakes to respect international standards in the field of Human Rights and in particular:

- The principles of the Universal Declaration of Human Rights
- The principles of the European Convention on Human Rights
- The principles of the International Labour Organisation (ILO)
- The OECD Guidelines for Multinational Enterprises,

In accordance with principles 4 and 5 of the Global Compact, **Lba strongly condemns and prohibits** its subsidiaries, suppliers and service providers from

engaging in any form of:

- **Forced labour**, i.e. any work performed against one's will and under threat of coercion – use of violence or intimidation, debt manipulation, withholding of wages or identity.
- **Undeclared work**, the act of not officially declaring a person working for a company to the competent authorities.
- **Child labour**. In compliance with the provisions of the International Labour Organisation (ILO), Lba refrains from using child labour, either directly or indirectly.

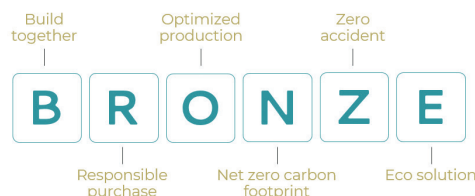
Lba is committed to its employees

"**Build Together**" is the first of the 6 principles of the Group's "B.R.O.N.Z.E" sustainable development policy, which reaffirms the Group's commitment to the following 6 principles of social responsibility.

1 / DEVELOPING TALENT AND SKILLS

Managers have a key role to play in driving the organisation forward, empowering their teams and promoting a culture of integrity. We encourage listening and initiative at all levels.

Lba is responsible for developing the technical and managerial skills of all employees at all levels. We therefore offer our employees a wide range of training programmes (both internal and external) to ensure their employability and their ability to progress within the Group.



2 / RESPECT FOR WORKING CONDITIONS AND EQUAL TREATMENT

The relationship between Lba, its employees and its partners is based on mutual respect, trust and individual dignity.

In line with this commitment, **we strictly prohibit discrimination** of any kind, including on the basis of age, nationality, religion, sexual orientation, marital, parental and family status, ethnicity, disability and political or trade union affiliation.

The Group is particularly committed to promoting diversity in the workplace, professional equality between men and women and the professional integration of young people.

Lba **also ensures compliance with regulations on working hours, pay and social benefits** in the countries where the Group operates. In addition to its legal obligations, the company seeks to share value through impact initiatives such as the introduction of employee share ownership in France.

3 / RESPECT FOR FREEDOM OF ASSOCIATION, THE RIGHT TO ORGANISE AND THE RIGHT TO COLLECTIVE BARGAINING

At all sites, the Group is committed to forging transparent and constructive links with employees and their union representatives to facilitate collective bargaining. To achieve this, we respect employees' rights to form or join trade unions and to sign collective agreements. We reject any threat of intimidation or reprisals and protect employees against acts of union discrimination.

Lba undertakes to prohibit any act of interference in trade unions, but will provide representatives with the information they need to negotiate constructively in good faith.

We also respect **employees' individual and collective freedom of expression** in accordance with applicable laws and regulations. We respect their ability to make an informed decision, free from coercion, as provided for by law.

In the event of a breach of this code, management undertakes to respect the right of employees to lodge complaints without suffering as a result.

4 / MAINTAINING THE PHYSICAL AND MENTAL INTEGRITY OF EMPLOYEES THROUGH A SAFE AND HEALTHY ENVIRONMENT

Safety is one of the principles of the Group's CSR policy, which is reflected in its **"Zero Accident" policy**. Each employee must set an example by adopting exemplary behaviour in terms of health and safety. **Any breach of health and safety rules in the workplace will be penalised.**

All new employees are trained in safety and the Group's internal practices. We encourage further training throughout employees' careers, and Lba is committed to **risk prevention** through awareness-raising and investment to continually improve working conditions.

Moral or sexual harassment or any form of harassment is strictly prohibited and the Group is committed to combating it.

Awareness training is provided to employees **and we encourage them to report any situation, whether you are a victim or a witness**, which threatens the integrity of an employee, via the alert system.

5 / PROTECTION OF PERSONAL DATA

Lba implements systems to ensure the confidentiality and secure processing of personal data used by the company. "Personal data" means any information relating to an identified or identifiable natural person. Our Group is committed to complying with applicable laws on the **protection of employees' personal data**, particularly in the context of the application of European Regulation 2016/679 of 27 April 2016 ("GDPR").

Lebronze alloys undertakes to collect and use personal data in a lawful, legitimate and ethical manner and to always respect the privacy of its employees and third parties with whom the Group comes into contact.

An IT charter is available and specifies all the best practices to be implemented on a daily basis. It is given to each new employee and must be respected.

6 / SUPPORT FOR COMMUNITY INITIATIVES

As a player rooted in our territories, **Lba is committed to supporting appropriate charitable actions** (donations to local associations, funding of positive-impact events, patronage, etc.) to contribute to the deployment of local actions and encourage employees to carry out voluntary work.

Donations to charitable organisations and sponsorship on behalf of our Group must comply with the laws, regulations and instructions in force within our Group and are subject to authorisation by Group Management.

Given our exceptional expertise, we believe we have a duty to pass on our metalworking know-how to the next generation. We are therefore **committed to education**, working with secondary schools and colleges located near our sites to promote this heritage and contribute to the education of future generations.

Finally, Lebronze Alloys applies human rights principles in the communities in which we operate and we ask the entire Group value chain to respect these principles.

Lba is committed to business ethics and practises zero tolerance of all forms of corruption

The Group combats corruption in all its forms, active or passive, direct or indirect, of private or public persons. All employees shall refrain from promising, offering, soliciting or accepting, directly or indirectly, an advantage in any form whatsoever that is contrary to the laws or regulations in force in order to obtain, retain, award or renew a contract or to obtain a personal advantage.

As these are offences that can carry heavy fines and prison sentences, zero tolerance will be applied.

Lebronze alloys, whose parent company is established in France, is subject to the provisions of the French "Sapin 2" Act of 9 December 2016. This code of ethics and conduct constitutes its anti-corruption code of conduct within the meaning of article 17, II, 1 of this law.

The instructions to be followed are as follows:

1 / GIFTS AND INVITATIONS

The acceptance or occasional offer of gifts or invitations of modest value is a legitimate business practice that must comply with the laws and customs of each country.

All employees must refrain from offering or accepting any gift or invitation, in whatever form, which:

- Could influence a decision or be perceived as influencing a decision by donors or beneficiaries;
- Would be made in violation of laws, regulations or instructions in force within our Group;
- Would have a value greater than the equivalent of 100 euros per year and per business partner, whatever the form (sums of money, material goods, services, travel).

2 / POLITICAL PARTY FINANCING

The payment of funds and/or the provision of services on behalf of our Group to a political party or organisation and to political figures is prohibited.

3 / LOBBYING

Lebronze alloys participates transparently in debates on the development of public policy or in legislative processes concerning its field of activity.

Under no circumstances may these actions lead to an offer or promise of a benefit in kind or in cash to a third party. All lobbying requires the authorisation of Group Management.

4 / MANAGING CONFLICTS OF INTEREST

The company must avoid any situation where the personal interests of an employee, or those of natural persons or legal entities to which he or she is linked, are likely to conflict with the interests of our Group. To determine whether a conflict of interest exists, each employee must therefore ensure that he or she is acting in the best interests of Lba, to the exclusion of any other consideration, in particular personal considerations.

The following situations may be considered likely to give rise to such conflicts of interest:

- Any direct or indirect interest in a competitor, supplier, service provider or customer (current or potential), except in the case of the purchase of listed securities in compliance with insider information rules;
- Any professional or personal commitment outside the company that could affect the commitment to the service of our Group, except with the prior authorisation of line management.

Any potential conflict of interest must be reported to line management.

5 / COMBATING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

Money laundering involves concealing the origin of funds obtained illegally (corruption, trafficking, tax fraud, etc.) so that they appear to have come from legitimate sources.

The financing of terrorism is a criminal offence characterised by the provision or collection of funds likely to be used to commit a terrorist act.

The Group asks its employees to prohibit or report to the Legal Department any of the following situations:

- Transactions in which the names and contact details of the parties are unknown,

- Transactions conducted by unknown or unnecessary intermediaries,
- Unnecessary or unexplained transactions,
- Unusual methods of payment,
- Financial flows that could have a criminal or tortious origin or destination (list of non-cooperative countries in tax matters , under embargo, etc.).

Before entering into a formal relationship with a third party, each employee must carry out checks to define the latter's corruption risk profile. In addition, it is necessary to ensure throughout the business relationship that the third party complies with its anti-corruption commitments.

Lba is committed to building relationships of trust with its stakeholders

The Group must make commitments to these third parties in order to establish a relationship of trust, but also expects them not to tolerate any form of corruption or influence peddling.

1 / RESPECT FOR THE RULES OF TRADE AND FAIR COMPETITION

The purpose of competition law is to ensure fair competition between companies on the market. Our Group is committed to scrupulously complying with the competition rules applicable in the various countries in which it operates. Accordingly, **each employee undertakes to refrain from participating in agreements with competitors** whose purpose or effect is to:

- Set prices and commercial terms;
- Allocate markets or customers, particularly in the context of calls for tender.

To this end, we ask employees to ensure that there are no exchanges of sensitive information with our competitors and to ensure that information concerning competitors has been collected legally.

2 / CUSTOMER RELATIONS

Our Group is committed to meeting the needs of its customers and is committed to:

- Providing quality products and services and constantly improving its technologies and methods with a strong focus on innovation and safety;
- Offering lead-times that do not restrict access to markets;
- As soon as possible, developing partnerships with our customers to reduce environmental impact (eco-design, waste recycling, circular economy, etc.)

In addition, all employees involved in international business operations **comply with the laws and regulations governing restrictions on the export of products and services**. If necessary, employees can ask the Legal Department for support.

3 / RELATIONS WITH SUPPLIERS AND SUBCONTRACTORS

Our Group strives to develop relationships based on trust and partnership with its suppliers in order to best meet its customers' expectations.

Taking everyone's interests into account and respecting fair contractual terms form the basis of relations between our Group and its suppliers.

Through the "**Responsible Purchase**" principle, Lebronze alloys encourages its suppliers and subcontractors to adopt ethical principles and environmental responsibilities equivalent to its own and reserves the right to audit or have a third party audit their practices and to take the results of these audits into account in its decisions. A code of conduct setting out the Group's requirements of these suppliers is available on our website.

In addition, all employees must comply with the Group's purchasing procedures.

4 / RELATIONS WITH COMMERCIAL INTERMEDIARIES

Our Group uses commercial intermediaries (brokers, business contributors, commercial agents, distributors, ...) These relationships are governed by a contract.

The selection, performance and remuneration of these intermediaries must be rigorously controlled by each employee concerned and comply with internal rules.

5 / DEALING WITH REQUESTS FOR EXTERNAL COMMUNICATIONS

Our Group has appointed people to be in charge of communications with the media, the financial community and regulatory bodies. Any request addressed to an employee (e.g. interviews, public speeches, position statements, etc.) must be forwarded to the persons designated by our Group for this purpose.

Lba is committed to respecting and protecting the environment

1 / PROTECTING THE ENVIRONMENT AND NATURAL RESOURCES

Our Group is a key player in the energy transition through its range of products and services. We also develop high-tech solutions designed to improve human health and ensure economic development that is compatible with environmental protection.

Lebronze alloys is fundamentally committed to **respecting and protecting the environment and biodiversity** in its industrial and logistical operations, in particular by:

- Optimum use of metals and components to limit the consumption of natural resources,
- Recovering offcuts and waste,
- Preventing pollution of any kind,
- Reducing water abstraction,
- Optimising the energy consumption of our processes and reducing carbon emissions,
- Using clean, safe technologies.

2 / CLIMATE COMMITMENT

As part of its low-carbon strategy, each year the Group carries out a full carbon assessment (scope 1, scope 2 and scope 3) and has made **commitments to reduce its carbon emissions in line with the recommendations of the Science Based Target agency**, which recommends the following targets to limit global warming to 1.5°C

- -50% reduction in Scope 1 and Scope 2 emissions between 2018 and 2030 values
- 25% reduction in Scope 3 emissions between the absolute values for 2021 and 2030.

To help achieve these objectives, all Group employees are invited to take part in the actions implemented by Lba (awareness-raising, information, ISO 50001 certification, investment plan, etc.) and we particularly encourage initiative in these areas.

We also encourage all our stakeholders to commit to an SBTi-compatible low-carbon trajectory.

Lba is committed to enhancing the value of the Group's assets

1 / RESPECT FOR CONFIDENTIALITY

Confidential information is a valuable asset. This is a Group asset comprising:

- Intellectual property (trade secrets, know-how, ...),
- Internal financial, technical or commercially sensitive information,

- Information relating to personal data and human resources,
- Information on the use of tools or systems,
- Information entrusted to us by third parties under the seal of confidentiality.

Our Group is careful to protect its confidential data and that of third parties. We are all responsible for protecting confidential information. We must ensure that it is used appropriately and passed on only to other authorised persons, in order to avoid any accidental, unauthorised or unprotected disclosure.

We must take care to avoid any unauthorised disclosure to third parties, such as customers and other business partners, and in the course of our conversations and activities outside the workplace

2 / ACCURACY OF MANAGEMENT DOCUMENTS

The reports and accounts of each entity in our Group faithfully reflect all the operations carried out by these entities (assets, liabilities, expenses, etc.). Each employee ensures that the information and reports communicated to each level of our Group accurately reflect all transactions in a timely manner.

3 / ASSET PROTECTION

All employees are responsible for protecting the Group's assets (both tangible and intangible) from damage, theft or misappropriation, and in particular for ensuring that they are not used for personal purposes.

Implementation of the ethics charter

PENALTIES

Failure to comply with some of the rules listed above may constitute a criminal offence in countries where our Group operates. Employees who contravene the Group's code of conduct may be liable to prosecution. For its part, the Group will initiate the appropriate disciplinary procedures in the event of conduct in breach of this code, in compliance with the corporate legislation of each country.

ALERT FOR BREACH OF THE CODE OF ETHICS AND CONDUCT

Any employee who is aware of a breach of the rules defined in this Code must report it using the internal alert procedure, which is available from your Human Resources department and at the following url link <https://alerte.lebronze-alloys.com>. The alert procedure is described in the Appendix to this document.

This system has been designed as an additional tool for employee freedom of expression. No employee can be punished, dismissed or discriminated against for testifying in good faith.

By signing this Code of Ethics and Conduct, Employees acknowledge that they have read and accepted the principles set out herein.

First and last name of the Employee	Date	Signature

APPENDIX: Internal Alert System

The law on transparency and combating corruption, known as "Sapin 2", aims to bring French legislation up to the best European and international standards in anti-corruption. Companies with more than 500 employees are required to set up an alert system.

1 / WHO CAN LAUNCH AN ALERT?

All employees, as well as external and occasional employees, acting disinterestedly and in good faith and having personal knowledge of the information. Good faith means reporting an alert without malice or the expectation of personal gain.

2 / IDENTITY AND PROTECTION OF THE WHISTLEBLOWER

The system guarantees the strict confidentiality of whistleblowers, and any breach of this confidentiality will be punishable by law. No disciplinary or discriminatory measures will be taken against employees who report an alert, even if the facts reported prove to be unfounded, provided that the employees acted in good faith.

Any direct or indirect reprisal against a company employee who has reported an alert will result in disciplinary action.

3 / WHAT IS THE ALERT ABOUT?

In addition to any conduct contrary to our Code of Ethics and Conduct, this alert mechanism may be extended to crimes and misdemeanours, serious breaches of French law and regulations, and serious threats or harm to the general interest.

For example, offences of:

- Corruption
- Influence peddling
- Illegal taking of an interest
- Embezzlement of public funds
- Favouritism...

Please note: Whistleblowing may not involve disclosures of information covered by defence secrecy, medical secrecy or lawyer-client privilege.

4 / ANONYMISATION OF THE WHISTLEBLOWER

While the Sapin 2 Act provides for the confidentiality of whistleblowers, there is no provision prohibiting anonymous reporting, provided that the

seriousness of the facts mentioned is established and the factual elements are sufficiently detailed. In addition, special precautions must be taken when dealing with this alert, such as examining the appropriateness of circulating it as part of the system.

5 / HOW DO YOU ISSUE AN ALERT?

Lba has set up 2 channels for issuing an Alert:

- A dedicated email address: alerteinterne@lebronze-alloys.com
- An online declaration platform: <https://alerte.lebronze-alloys.com>

The email and declaration will be sent to the Lebronze alloys ethics officer.

6 / HOW ARE ALERTS HANDLED?

Employees who have sent an alert will receive an acknowledgement of receipt within 8 working days of the date of transmission.

Based on objective criteria, the officer in charge then analyses the alert and determines the appropriate action to be taken. Exchanges can be organised, while preserving the confidentiality of the whistleblower, as well as possible support from external sources. The officer shall also inform the whistleblower of the reasonable and foreseeable time required to examine the admissibility of his/her alert. At the end of the investigation, and whatever the outcome, a formal, reasoned decision is sent to the issuer of the alert by the officer in charge.

7 / PRESUMPTION OF INNOCENCE OF THE PERSON CONCERNED BY THE ALERT

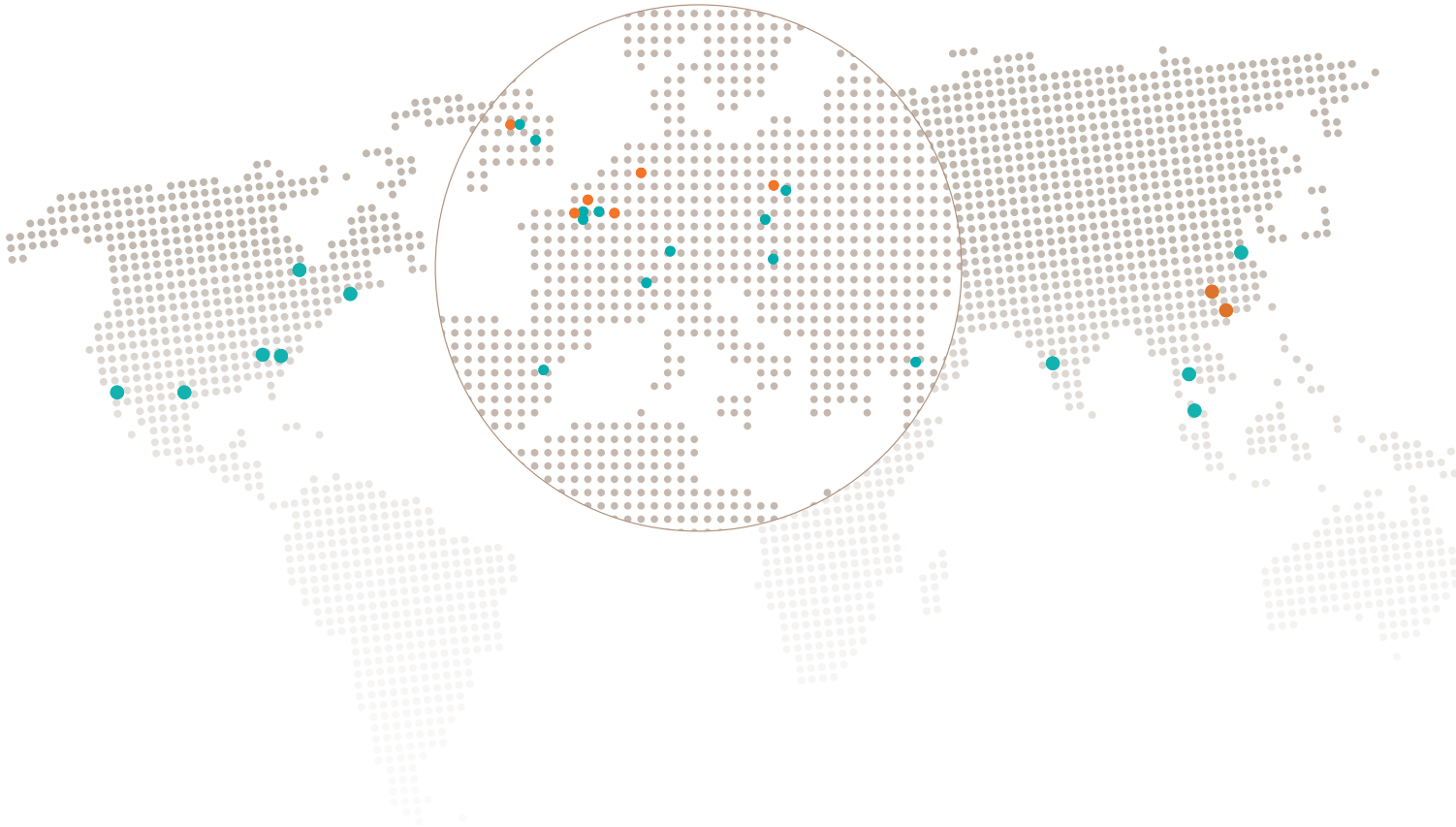
Any employee who is the subject of an Alert is presumed innocent until the allegations against him or her are established. They must be informed, as soon as the Alert is recorded, of the facts of which they are accused so that they can exercise their rights, including their rights of defence and respect for the adversarial principle.

They may request access to the data concerning them and ask for it to be corrected or deleted if it is inaccurate, incomplete, ambiguous or out of date. Under no circumstances may the employee concerned by the Alert obtain information about the identity of the person who issued the Alert.



lebronze alloys

World leader in special high-performance copper and nickel alloys



● Lebronze alloys Factories and Service Centers ● Distributor partners

Lebronze alloys Group is a world leader in the development and fully integrated production of high-performance specialty copper and nickel alloys.

Thanks to a multidisciplinary know-how, the Group provides innovative solutions to all major industries such as Aeronautics, Electronics, Space, Automotive, Energy, among others.

Our 6 production facilities and 750 employees manage a unique range of metal processing technologies: continuous and semi-continuous casting, extrusion, hot and cold rolling, drawing, open-die forging, hot stamping, closed-die forging, cold forming, machining, non-destructive testing, etc.

We are a major decarbonation player for many industries. We continually strive to reduce our carbon footprint and our products are key for decarbonation applications in our customers' industries.

The Group's commitment is to find appropriate and optimized solutions for every sector's requirements.



contact@lebronze-alloys.com

www.lebronze-alloys.com



Member of the "Coq Vert" community