

SUPPLIER CODE OF CONDUCT

Version updated in July 2026

PREAMBLE

Our Group, as a collective of responsible companies, is committed to working exclusively with suppliers who share its ethical values and its commitment to sustainable development. This Code of Conduct is intended to clearly define the KELIAS Group's expectations of its suppliers with regard to social, environmental, and ethical responsibility. We firmly believe that an ethical and sustainable supply chain is essential to our long-term success and to building a better future for all.

1. COMPLIANCE WITH LAWS AND REGULATIONS

- **Legal compliance** : Suppliers must not only comply with all applicable laws and regulations in the countries in which they operate, but must also commit to promoting a culture of compliance within their organization. This includes laws relating to labor, the environment, health and safety, anti-corruption, as well as all regulations specific to their sector of activity.
- **Vigilance** : Suppliers must establish robust internal procedures to monitor and assess their ongoing compliance with laws and regulations. These procedures must include regular audits, staff training, and reporting mechanisms to escalate any compliance issues. In the event of non-compliance, corrective measures must be taken promptly and effectively.

2. HUMAN RIGHTS AND WORKING CONDITIONS

- **Prohibition of forced labor and child labor** : Suppliers must ensure that no form of forced, compulsory, or coerced labor, nor child labor, is present at any level of their supply chain. They must implement rigorous verification processes to ensure that their subcontractors and partners also adhere to these principles.
- **Respect for workers' rights** : Suppliers must respect the dignity and fundamental rights of all their employees, guaranteeing freedom of association, the right to collective bargaining, and equal opportunity for all, without any discrimination based on gender, origin, religion, sexual orientation, or any other personal characteristic.
- **Decent working conditions** : Suppliers must provide their employees with a safe, healthy, and respectful working environment. This includes measures to prevent accidents and occupational illnesses, access to adequate sanitary facilities, fair remuneration in accordance with local laws, and compliance with working hours, including rest periods and leave entitlements.

3. ENVIRONMENTAL PROTECTION

- **Minimization of environmental impact** : Suppliers must adopt a proactive approach to minimizing the environmental impact of their activities. This involves implementing sustainable practices, such as reducing consumption of natural resources, energy, and water, using recycled and recyclable materials, responsible waste management, and promoting the circular economy.
- **Chemical management** : Suppliers must use and manage chemicals responsibly, in compliance with applicable regulations and by implementing measures to prevent risks to human health and the environment. They must promote the use of less hazardous substances and encourage the substitution of toxic chemicals with safer alternatives.

4. BUSINESS ETHICS

- **Anti-corruption** : Suppliers must adopt a zero-tolerance policy toward corruption and fraud, and must establish procedures to prevent, detect, and report such practices. This includes staff training, the implementation of internal controls, and cooperation with the competent authorities in the event of suspected corruption.
- **Transparency and integrity** : Suppliers must act with honesty, integrity, and transparency in all their business relationships. They must avoid conflicts of interest, comply with fair competition rules, and provide accurate and complete information to our Group.
- **Confidentiality** : Suppliers must protect confidential information entrusted to them by KELIAS, including commercial, technical, and personal information. They must implement appropriate security measures to prevent the unauthorized disclosure of such information.

5. RESTRICTIVE MEASURES AND IMPORT CONTROLS

- **Compliance with international sanctions** : Suppliers must comply with all applicable restrictive measures, embargoes, and international sanctions in force (European Union, United States, United Nations) that may affect the products and raw materials delivered to KELIAS. They warrant that no delivered product originates, directly or indirectly, from a country, entity, or person subject to such measures.
- **Origin traceability** : Suppliers must be able to substantiate the origin of the raw materials used in the composition of the products delivered, including the country of extraction, smelting, and casting for metallurgical materials. Suppliers must notify KELIAS of any change in sourcing, any exposure to restrictive measures, or the opening of any customs or criminal proceedings related to international sanctions that may affect deliveries. Suppliers must implement regular monitoring of applicable sanctions lists, provide training to their procurement and logistics teams, and retain supporting documentation of origin for a minimum of five (5) years.

6. HEALTH AND SAFETY

- **Risk prevention** : Suppliers must establish a culture of safety within their organization by identifying, assessing, and controlling risks to the health and safety of their employees. This includes staff training, the provision of personal protective equipment, and the implementation of emergency procedures.
- **Emergency management** : Suppliers must have clear and effective emergency plans in place to respond to emergency situations, such as accidents, fires, or natural disasters. These plans must be regularly tested and updated, and personnel must be trained in their implementation.

7. IMPLEMENTATION AND MONITORING

- **Communication** : Suppliers must ensure that this Code of Conduct is clearly communicated to and understood by all their employees, subcontractors, and business partners. They must foster a culture of open dialogue and transparency, in which everyone feels comfortable reporting any compliance issues.
- **Assessment and continuous improvement** : Suppliers must implement an effective compliance management system to regularly assess their performance in the areas of social, environmental, and ethical responsibility. They must commit to a process of continuous improvement by identifying areas for improvement and implementing corrective actions.
- **Audits** : KELIAS reserves the right to conduct audits of its suppliers, including their subcontractors, in order to verify compliance with this Code of Conduct. Such audits may be announced or unannounced, and may include interviews with personnel, review of documents, and visits to facilities.

8. ETHICAL WHISTLEBLOWING MECHANISM

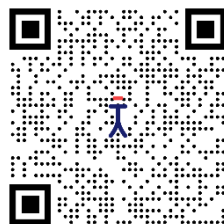
KELIAS is committed to promoting a culture of transparency and integrity at every level of its value chain. In accordance with this commitment, we make available to our suppliers, as well as to their own employees and partners, a secure and confidential reporting channel.

This mechanism enables the reporting of any situation, practice, or request that appears to be contrary to the principles set out in this Code of Conduct or, more broadly, to business ethics.

KELIAS guarantees that every report received will be handled with the utmost confidentiality and will be subject to an objective assessment. Our Group strictly prohibits any form of retaliation against any person or entity that has used this whistleblowing mechanism in good faith.

Any report may be submitted, including anonymously, via the secure platform accessible at the following address:

<https://signalements-kelias.besignal.com>



9. IMPORTANCE OF COMPLIANCE WITH THE CODE AND CONSEQUENCES OF NON-COMPLIANCE

Full compliance with this Code of Conduct by our suppliers is of paramount importance. It forms the foundation of a relationship of mutual trust and a lasting partnership with our Group. By adhering to these principles, our suppliers demonstrate their commitment to sharing our values and contributing to our shared goal of creating a more responsible and sustainable future.

Any breach of the principles and requirements set out in this Code will be regarded as a serious violation of the contractual obligations with any one of the entities of our Group. In the event of identified non-compliance, each entity of the KELIAS Group reserves the right to take appropriate measures, up to and including termination of the contract.

As a first step, KELIAS will notify the supplier of the identified non-compliance and request that the supplier provide a detailed corrective action plan within 15 days of receipt of the formal notice. If the supplier's response is unsatisfactory, or if no corrective action is taken within the prescribed timeframe, KELIAS reserves the right to terminate the contract without compensation.

Our Group encourages its suppliers to adopt a transparent approach to compliance by implementing robust management systems and communicating openly with our Group in the event of any difficulty or query. The KELIAS Group remains firmly convinced that close and transparent collaboration is essential to ensuring the joint building of an ethical and sustainable supply chain.

CONCLUSION

Compliance with this Code of Conduct is an essential condition for establishing and maintaining a commercial relationship with the KELIAS Group.

Prior to signing any contract with an entity of the KELIAS Group, the supplier undertakes to:

- Carefully read and understand this Code of Conduct in its entirety;
- Implement the processes and procedures necessary to ensure compliance with all the principles and requirements set out in this Code, including within its own supply chain (employees, suppliers, subcontractors, partners, etc.);
- Cooperate fully with the relevant entity of our Group in the event of an audit or investigation into its compliance with this Code;
- Immediately notify the KELIAS Group of any actual or potential non-compliance situation, and commit to promoting KELIAS's ethical whistleblowing mechanism (<https://signalements-kelias.besignal.com>) among its own staff as a means of raising any concerns confidentially;
- Take prompt and effective corrective action in the event of identified non-compliance.

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