

Code of Ethics

Because business integrity
is our first commitment



euoAPI
Active Solutions for Health

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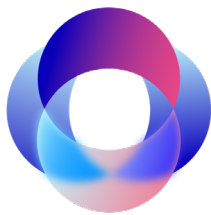
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Our values

Our people are united by four core values. These foundational principles are shared across the organization. At EUROAPI, we strongly believe without compromise in:



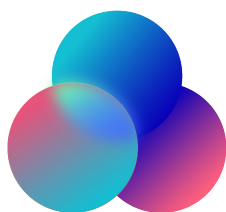
Ownership

Embracing ownership means that we are driven by the impact of our actions, our work on public health and the growth of our company. We believe that ownership is about delivering results and consistently acting in the best interest of the organization and its mission as a public health leader.



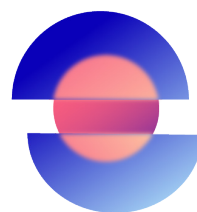
Passion

We are committed to excellence in execution, serving our clients and partners while strengthening our teams and driving company performance through innovation. Client satisfaction is a daily priority.



Collaboration

Collaboration & trust are the foundations of how we work. We believe progress is achieved together, across our teams and with our clients, celebrating shared success. When teams work as one, they make better decisions and support each other more effectively. At EUROAPI, collaboration fuels an entrepreneurial, solutions-driven mindset that sparks innovation and creativity.



Care

At EUROAPI, care means acting with sustainability, respect, and integrity toward all our stakeholders, while striving for constant improvement in everything we do.

Care is a key criterion that guides us in every decision we make. It translates namely into protection, development and diversity for our employees, meeting patients' and customers' needs, ESG commitments and regulatory standards.

Message from the CEO



"At EUROAPI, integrity is not just a principle, but the driving force building our success and growth."

At EUROAPI we are committed to maintaining the highest standards of integrity, transparency and accountability in all our activities. Our Code of Ethics reflects our fundamental principles and provides a framework to guide our actions, decisions and behavior in the performance of our daily work.

The Code is aimed at complementing our core values and at enhancing the trust-based relationships with our commercial partners and stakeholders for a sustainable growth and continued success.

To achieve this, we must place integrity at the center of every decision we make by permanently exercising sound judgment: how we behave is as important as reaching our commercial goals.

The Code serves as a guide that fuels our culture of integrity, addressing critical elements such as preventing corruption, respecting people, and protecting the environment. Ethics and Compliance has also designed a robust program which includes policies, online and in person trainings, to ensure full awareness and adherence.

We are collectively responsible for upholding the Code principles and to apply them with no compromise in all our internal and external interactions.

Ethics and Compliance are embedded in EUROAPI's DNA and I rely on all of you to reach our goals in all honesty, fairness and respect.

David Seignolle

CEO

Who should follow this Code?

This Code of Ethics applies to every EUROAPI employee, every contractor and everyone conducting business on behalf of EUROAPI.

Each of us must read, understand and comply with the principles set out in our Code of Ethics.

If we believe that our ethical standards may be compromised, we have the duty to raise the concern.



How to use the Code of Ethics

The Code of Ethics is the reference document that must guide our behaviours, actions and decisions in our daily activities, in all circumstances.

Some situations are not easy to manage. Making ethical decisions sometimes appears difficult, as it goes beyond simply being compliant with a set of rules.

The Code of Ethics is the reference document that must guide our behaviours, actions and decisions in our daily activities. It helps us to act with integrity in all circumstances, by driving us to question ourselves about the business situations we encounter.

Beyond this Code, EUROAPI has also implemented a set of policies and procedures we have to comply with, to ensure that we do the right thing, in the right way, at the right time and for the right reasons.

There may be instances when the guidance in this Code varies with the local law or customs of a particular country. In cases where local law or customs impose higher standards than those set in the Code, local law and customs should always apply. If, by contrast, the Code provides for a higher standard, it should prevail.

If you have any doubt, ask yourself the following questions:

- ✓ Am I violating any law, EUROAPI Code of Ethics, policies and procedures?
- ✓ Am I being inconsistent with ethical values?
- ✓ Am I treating others the same way I would expect to be treated?
- ✓ Will I owe something in return to anybody?
- ✓ Could my decision appear improper if published on the front page of a newspaper?

If the answer to any of these questions causes you concern, do not keep it to yourself: raise the concern.

How to raise a concern?

If you have a concern or believe in good faith that a law, a regulation, an industry code of conduct, a EUROAPI policy or standard, or one of the principles of the EUROAPI Code of Ethics has been or is about to be violated, you have the duty to raise the concern through the channel you consider to be the most appropriate.

We encourage you to raise your concern directly to the Head of Ethics and Compliance or through the Compliance Helpline.

If a concern is reported to you, you must also promptly refer the matter to the Head of Ethics or Compliance or through the other available channels.

Multilingual and secured Euroapi ethics line is available 24/7 on the EUROAPI website or by using the below QR code

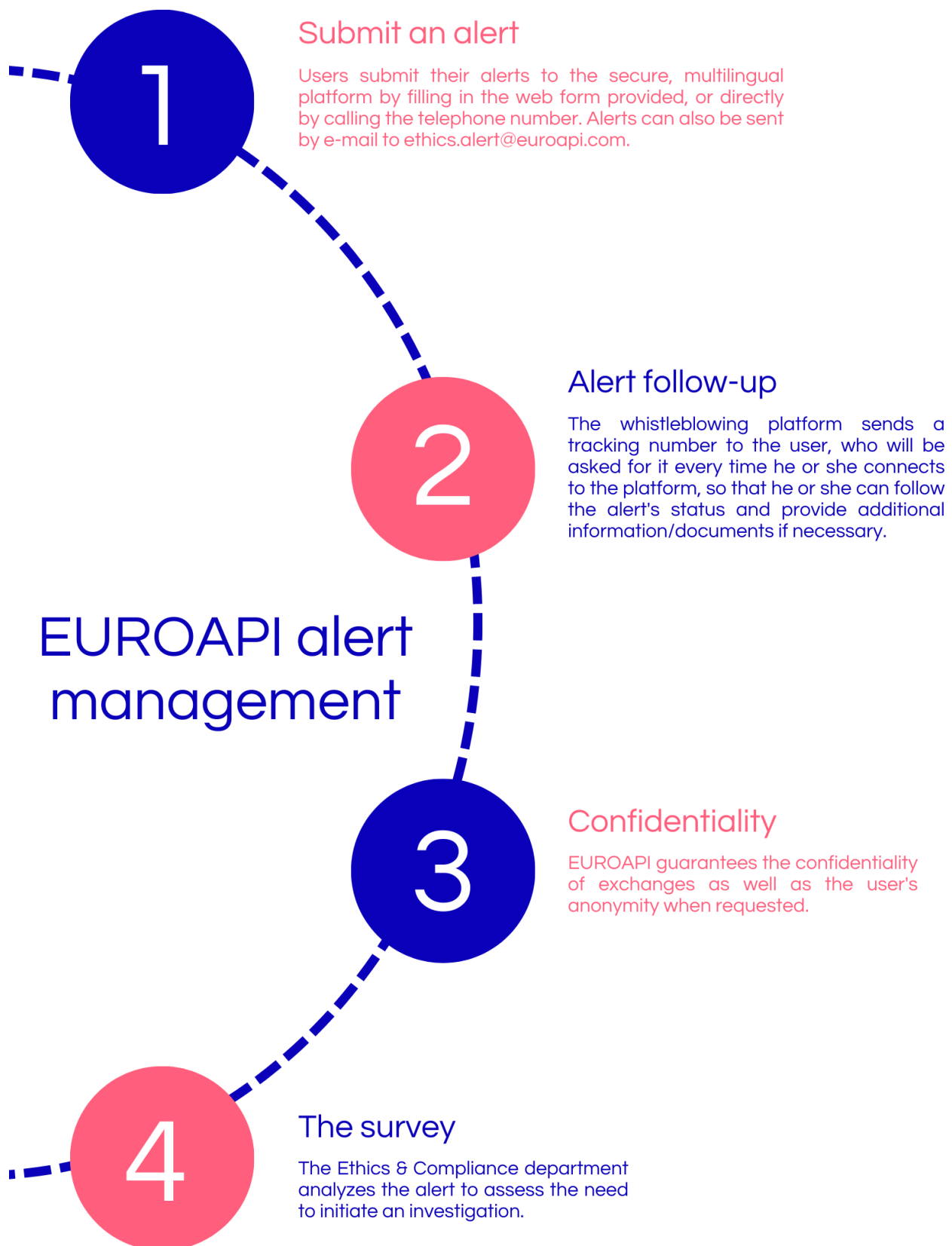


Employees who raised concerns will not be subject to discipline or discrimination, provided that they act in good faith and with no malicious intent, even if the facts reported prove to be inaccurate or no further action is taken.

The Ethics and Compliance department will investigate the allegations reported, supported by other EUROAPI functions when necessary.

When the investigations confirm the reported allegations, EUROAPI will address them by corrective and/or disciplinary actions and legal proceedings, if deemed necessary.

For any additional information or guidance on alert management, please consult the dedicated Alert management procedure.



Respecting and protecting people and the environment

For a stimulating, creative and safe
working environment



Respecting people and human rights

EUROAPI fosters a stimulating, creative and non discriminatory workplace for all employees and external business partners.

We are committed to respecting and promoting human rights, in compliance with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

We are vigilant on issues covered by the Fundamental Conventions of the International Labor Organization (including prohibition of child labor and forced labor, respect of freedom of association).

We promote diversity, practice fairness and express courtesy in our interactions with individuals inside and outside EUROAPI.

WE EXPECT our external business partners to share the same values as ours and adhere to the fundamental principles of the International Labor Organization, especially those relating to child labor, forced labor, working hours, pay, freedom of association and nondiscrimination.

WE ARE COMMITTED TO:

⇒ **Prohibiting any conduct that may negatively affect a person's dignity or violates human rights.**

- political opinions
- nationality
- family situation.

⇒ **Maintaining a zero tolerance for harassment and all forms of discrimination on grounds such as:**

- gender
- gender identity
- age
- origin
- religion
- sexual orientation
- physical appearance
- health
- disability
- trade union activity

⇒ **Supporting equal opportunity for each employee or job applicant**

in recruitment, training access, compensation, welfare, internal mobility and career development. We consider non-discriminatory factors such as skills, experience and personal aptitude in our employment decisions.

⇒ **Promoting diversity**, as we believe the distinct identities of our people and external business partners are a source of strength and a key ingredient of our success.

⇒ The Group is a member of association France Chimie. In line with its values, one of the Group's first commitments was to become a signatory of the Responsible Care® charter that includes its six voluntarily imposed regulations. This illustrates the Group's support for the safe management of chemicals throughout their lifecycles. Commitments include continuously improving environmental, health, safety and security knowledge and the performance of the Group's technologies, processes and products to avoid harm to people".

⇒ Condemning the use of forced labor and the exploitation of child labor by complying with laws on slavery and human trafficking, and respecting freedom of association.

At EUROAPI, WE MUST:

- ✓ Respect others, behaving towards them as they deserve to be treated as fellow human beings.
- ✓ Never tolerate or engage in any form of harassment (e.g., physical, sexual, psychological, verbal, or of any other form).
- ✓ Challenge our bias and avoid prejudice about the opinions, appearance or attitudes of our colleagues.
- ✓ Create or contribute to creating a positive work environment for people working in or for EUROAPI.

Preserving health and safety, protecting people and the environment

At EUROAPI, preserving health, safety and protecting people and the environment is a duty.

Our collective engagement is to ensure ...

- ... a safe and healthy workplace for our employees and external partners,
- ... to minimize the environmental footprint of all our activities,
- ... to protect surrounding communities and society.

WE ARE COMMITTED TO:

- ⇒ **Preserving the health, quality of worklife and safety of employees and every person connected to us, even beyond our immediate interactions.** This commitment implies we will assess, prevent and control physical, chemical and biological risks inherent in our activities.
- ⇒ **Minimizing the environmental footprint of our activities and products across their value chain,** by conserving water and energy, and lessening our residual impact through the reduction of emissions, effluents and waste.

EUROAPI recognizes its role in addressing climate change and commits to take environment-friendly decisions whenever and wherever possible.

At EUROAPI, WE MUST:

- ✓ Comply with applicable laws and regulations where we operate.
- ✓ Implement relevant health, safety and environmental requirements, expert recommendations, best practices and share learning experiences.
- ✓ Leverage the health, safety and environment mindset in a transparent, respectful and accountable way across the organization.
- ✓ Strive to prevent accidents, avoid health risks, promote wellbeing as well as reduce environmental impacts.
- ✓ Engage our partners, suppliers and contractors to adopt responsible health, safety and environmental protection policies.
- ✓ Promote a constructive attitude of transparency and dialogue with stakeholders on their health, safety and environmental protection strategy.

Protecting personal data and maintaining accurate records

At EUROAPI, protecting the personal data of our employees, and other business partners, is critical.

Privacy and Personal data protection is a fundamental right: it is crucial to protect the personal data of our employees and other business partners, especially given the development of communication and information technologies.

Similarly, EUROAPI is taking care of properly recording of its transactions in order to ensure transparency in the accuracy of its activities and to fully comply with applicable regulations.



We are committed to protecting personal data and to processing it only within the boundaries of applicable law.

"Personal data" means any information that can allow the identification of individuals directly or indirectly notably with an identification number or with one or more factors specific to their physical, physiological, mental, economic, cultural or social identity (e.g., name, date of birth, social security number, physical characteristics, email address, computer ID, and health-related or genetic information).

"Accurate records" EUROAPI complies with regulatory requirements governing fair and timely disclosure of information to investors and shareholders. We ensure that accurate, reliable and relevant information concerning EUROAPI business and financial situation is regularly communicated to its stakeholders and that the financial and non-financial data we publish is always accurate

These rules are clearly set in our Privacy policy to ensure that our internal processes are in line with such requirements.

We will ensure that personal data collected and processed by EUROAPI are limited to what is strictly needed for the business purposes and will take the appropriate measures to protect the confidentiality and the integrity of such data.

At EUROAPI, WE MUST:

- ✓ Comply with applicable laws and regulations of the jurisdictions in which we collect, store and use personal information.
- ✓ Protect personal data while we collect, process, use, disclose and store it.
- ✓ Report data privacy incidents to one's manager, site security officer or Data Privacy Officer.
- ✓ Ensure that the information or transactions that we record reflect accurately our operations and declarations.

To go further



These examples illustrate real life situations to help you to take the right decision with regard to the points previously developed.

Respecting people: A manager informed the HR colleague in charge of recruitment that he will only consider female candidates as there are too many men in his department. How to react?

The HR colleague shall immediately report the case to his/ her manager as such behavior is discriminatory and also give strong feedback to the manager due to his inappropriate remark.

Preserving health: You notice that one of your colleague does not wear his safety equipment when approaching an area requiring them. What should you do?

As safety is a crucial part of our day-to-day commitment, you should remind your colleague to wear his safety equipment and prevent him from working without it.

Protecting personal data: A head of department requires HR colleague to give her access to all the personal data of her team, without justifying the reason. Which answer to give?

The HR person shall remind the manager that she will give her access to the sole personal data needed and that such access must always be properly justified.

Accurate records: Due to time pressure and workload, an employee decides not to perform some quality controls on a product before to send it to the client but mentions in the supporting documentation that such controls were made. What is the issue with such practice?

We have a duty to maintain accurate and reliable records. Consequently, manipulating records (financial, regulatory, legal, commercial...) is strictly prohibited as it does not reflect the accurate situation of the company.

If you suspect that records have been/ are about to be compromised, report it immediately through the available channels.

Integrity in our business practices

To maintain trust in our relationships with company stakeholders, customers, suppliers, shareholders, other business partners and members of the civil society in which EUROAPI operates



Dealing with conflict of interest

Any potential conflict of interest must be identified and handled effectively.

A conflict of interest is a situation posing a risk that personal interest will interfere, or has the appearance of interfering, with EUROAPI's legitimate business interests.

Any conflict of interest creates an appearance of impropriety, which may undermine confidence in EUROAPI. It is therefore essential to identify any potential conflict of interest and handle it effectively.

We are committed to proactively detecting and disclosing conflict of interest situations, and providing measures to eliminate or mitigate them.

To prevent a conflict of interest, we must be vigilant and adopt appropriate behavior in situations in which the objectivity of our business decision may be impaired, especially in:

⇒ **External commitments**

- Working for or receiving compensation from a EUROAPI vendor or customer.
- Maintaining a financial interest in or a relationship with a EUROAPI competitor, customer or vendor, or with any third party doing business with EUROAPI.
- Acquiring or owning, directly or indirectly, any interest in property or assets of any kind for the purpose of selling or leasing it to EUROAPI.
- Soliciting personal benefits from a third party for influencing a favorable decision by EUROAPI

towards such third party.

- Engaging in any outside activity substantial enough to raise questions about your ability to devote appropriate time and attention to your assigned responsibilities.

⇒ **Personal relationships**

- Interacting with a relative working for, or applying to work for, EUROAPI, a competitor, vendor or customer of EUROAPI.
- Purchasing goods or services on behalf of EUROAPI from a relative or a firm in which a relative has any interest.

At EUROAPI, WE MUST:

- ✔ Disclose any actual or potential conflict of interest before engaging in the transaction, activity or relationship leading to the reportable situation.
- ✔ Disclose actual or potential conflicts of interest as part of the hiring process.
- ✔ Disclose any actual or potential conflict of interest annually when being a EUROAPI Exposed Employee, defined as first-line managers and all EUROAPI employees regularly involved in contracting, purchasing, selling or leasing services, materials, property or products.
- ✔ Abstain from serving on a board of directors of any EUROAPI customer, vendor or competitor.
- ✔ Ask one's manager or one's Head of Ethics and Compliance how to handle a conflict of interest rather than rely solely on one's own interpretation, as our self-assessment may be impaired by the situation.

Fighting bribery and corruption

Bribery and corruption are unacceptable: at EUROAPI, fighting all forms of corruption is a priority.

Corruption deters economic development, as it can undermine fair competition and destroy trust in a company or individual.

At EUROAPI, fighting all forms of corruption is a priority. Promoting a culture of ethics and integrity is key to maintaining the trust of stakeholders and society. EUROAPI is committed to fostering a culture of integrity throughout the organization and clearly communicating expectations to reduce the risk of corruption.

EUROAPI employees are prohibited from giving, promising to give or offering to give anything of value, to any person for the purpose of influencing any act or decision, notably when interacting with customers, suppliers and government officials.

This prohibition also applies to indirect corruption, that is, acts carried out by a third party in the name or on behalf of EUROAPI.

⇒ **Anything of value may include but is not limited to:**

- › cash
- › gifts
- › entertainment, accommodations and meals
- › travel expenses
- › services
- › employment offers
- › loans
- › donations or contributions
- › any transfer of value, even of nominal value.

To ensure a proper understanding and application of the rule prohibiting any form of corruption, EUROAPI has established different procedures and policies to guide employees. These procedures and policies cover, notably, the prohibition of bribery, gifts and invitations, conflicts of interest or due diligences on third parties and are accessible to all employees.

Each Euroapi employee must be mindful of appearance and each situation must never be assimilated to corruption in order to avoid any liability and damage in terms of image.

Euroapi expects its commercial partners to put in place similar standards to ensure full adherence to the fight against corruption and bribery.

⇒ **Receiving items of value**

- › Accepting a gift might cause the receiver to feel an obligation, potentially undermining the objectivity of his/her decisions and may be perceived as a gift intended to corrupt him/her or another EUROAPI employee.

At EUROAPI, WE MUST:

- ✓ Comply with all applicable anti-corruption and anti-bribery legislations and conventions in every country where EUROAPI does business and require that contractors do the same. Examples include the 1997 OECD Convention, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), the French anticorruption law (Sapin 2 Law).
- ✓ Comply with all global policies aiming to prevent, directly or indirectly, a corruption risk.
- ✓ Conduct risk-based anti-bribery due diligence on third parties before engaging them.

Ensuring trade compliance & fighting money laundering

EUROAPI respects the laws and regulations applying to the export of its products

The countries in which we operate regulate the transfer of funds, the transportation of goods, raw materials, equipment and technology across borders in order to ensure a full compliance of import & export transactions.

In the same manner, we must remain sensitive to the money transfers that are executed every day with our clients, suppliers, service providers and make sure that they do not participate to improper schemes or transactions that could expose EUROAPI.

At EUROAPI, we must:

- ⇒ Ensure that each EUROAPI transaction comply with all applicable import/export controls, sanctions and regulations. Consequently, EUROAPI will never participate in the manufacturing or the sale of illicit drugs or products used for warfare or warlike activities, or for other internationally prohibited activities.
- ⇒ Condemn and prohibit the participation of its employees and its partners in money laundering transactions, defined as money or assets derived from illegal / criminal activities for the purpose of presenting them as legitimate.
- ⇒ Implement processes for transactions implying funds transfers, embargoes or sanctions situations to be properly analyzed and treated to reflect our commitment to act in a lawful and ethical way, anytime and everywhere.

- ⇒ Report any situation that is likely to contravene export control/ trade compliance regulations.
- ⇒ Ensure full respect of sanctions/ embargoes rules in the countries where we operate and will not ship from or to individuals, companies or countries if we know or suspect that such activity will violate applicable import, export or sanctions laws or regulations
- ⇒ Review thoroughly any suspicious transaction to verify the legality of the activities and the origin of its funds

Seek advice from Ethics and Compliance if you have doubt about the regularity of a transaction.

Respecting free competition

EUROAPI supports a competitive marketplace, respecting and adhering to fair competition and trade practice laws.

Competition and antitrust issues may arise from contacts between EUROAPI and its competitors, suppliers or customers. All employees must comply with competition and antitrust laws and refrain from all unfair behaviour towards competitors. Anti-competitive behaviours may include:

- ⇒ Entering into agreements, including informal understandings, with competitors for price fixing, bid rigging, market allocation and agreements to restrict supply.
- ⇒ Exchanging competitively sensitive information with competitors.
- ⇒ Abusing a potential position of market dominance.
- ⇒ Imposing restrictions on customers or suppliers.
- ⇒ Entering into certain mergers and acquisitions.

At EUROAPI, WE MUST:

- ✓ Never allow new recruits to share confidential information about competitors for whom they used to work.
- ✓ Not exchange with competitors, directly or indirectly through suppliers or other intermediaries, information including:
 - ✓ price scales, pricing methods, cost of goods and services or products, chargebacks, promotional and billing terms, profits or margins, and discounts
 - ✓ terms of sale
 - ✓ marketing plans and strategies of our products
 - ✓ industrial capacity, production and shipping logistics, product quality, future expansion plans
 - ✓ market allocation by region, customer or therapeutic field
 - ✓ tenders and the intention to bid or not bid for them
 - ✓ suppliers or customers
 - ✓ any sensitive and confidential information of a business relevance.
- ✓ Avoid informal contacts with competitors to discuss issues that might violate antitrust or competition law. Examples of such meetings are forums, conferences, and trade association meetings.
- ✓ Not enter into agreements to boycott customers or suppliers. Antitrust or competition laws may vary significantly from country to country. In case of doubt, seek advice from your Legal Department.

To go further



Conflict of interest/ bribery: A good friend of yours ask that you include his company in a tender that you supervise for the appointment of a new service provider. He also promises you a reward if he gets the business. How should you handle such situation?

Firstly, you must never enter into a relationship that constitutes a potential conflict of interest (here: mixing personal and professional relationships). Secondly, it is your duty to refuse any proposal putting you in a corruption scheme (here: gift offered to win the tender). Always report such situation to Ethics and Compliance.

Trade compliance: A member of the commercial team gets an interesting proposal from a new prospect located in a new country. He is tempted to accept immediately the offer. Is this the right approach?

The person shall previously check whether opening this new market is regulated (export licence) and does not create an exposure for the company (existence of sanctions against the country / the prospect). Such verification must be done in liaison with Ethics & Compliance.

Fair competition: You are attending a trade show and one of your competitors approaches you to propose a win-win deal by sharing markets between your two companies, so each of you can sell freely on a market without having to worry about competition.

Such deal is totally illegal, and you should firstly avoid any contact with competitors and, secondly, stop the conversation and report the event to legal department to get guidance on the proper way to handle the situation.

Integrity in managing company information

To protect and preserve our
competitiveness, image and reputation

03

Protecting confidential and sensitive information

Protecting any confidential and sensitive information is crucial.

Confidential information is one of our most valuable assets.

Inappropriate use or disclosure of such information can cause serious harm to our company, business partners, suppliers and customers, weakening our competitiveness, exposing us to liability, and damaging our reputation. It is the responsibility to each and every one of us to ensure the protection of confidential data.

This commitment applies equally to information about our company, our employees and our business partners.

EUROAPI CONFIDENTIAL INFORMATION

EUROAPI's Confidential Information is used in connection with EUROAPI's business that is not generally known and commercially sensitive. Its protection plays a vital role in EUROAPI continued growth and ability to compete. Each EUROAPI employee has a duty to protect and make prudent use of these assets that shall, in any event, only be used within the strict extent of its missions.

Here are examples of the wide variety of information that needs to be secured:

- Products, manufacturing processes, technical data, specifications, technologies, know-how
- Business strategies, legal documents, product manufacturing price structure, customer, professional or vendor lists,
- Any unpublished financial information of EUROAPI, clients, transactions, merger and acquisitions,
- Internal guidelines and policies, or
- Any information on EUROAPI employees.

Employee's obligations with respect to EUROAPI's Confidential Information:

AT EUROAPI WE MUST

- Take all reasonable measures to protect EUROAPI's Confidential Information, in conformity with EUROAPI's internal associated procedures.
- Mark EUROAPI's Confidential Information documents "Confidential" or "Proprietary"
- Be aware and understand the content of each confidentiality obligation toward a partner
- Be careful of discussions on EUROAPI's Confidential Information in public spaces, common areas

AT EUROAPI WE MUST NOT

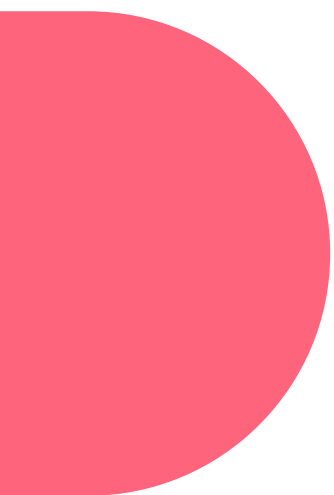
- Disclose EUROAPI's Confidential Information to other EUROAPI employees except on a "need to know" or "need to use" basis and make sure such an employee has the right to receive this information.
- Engage third parties to handle EUROAPI's Confidential Information without appropriate authorisation and an appropriate confidentiality or non-disclosure agreement in place,
- Post or discuss EUROAPI's Confidential Information on publicly available websites or social media sites
- Use EUROAPI's Confidential Information for our own benefit (as an employee) or the unauthorized benefit of third parties
- Disclose any confidential information to a third party or a EUROAPI's employee in case of doubt without making sure such an employee has the right to receive this information and that the third party is bound by written confidentiality obligations.

Third party Confidential Information

All EUROAPI employees are strictly forbidden from appropriating information learned from a third party in the course of their work when it is reasonable to believe that such information is confidential, that such appropriation constitutes plagiarism or an infringement of a third party's intellectual property rights.

Preventing insider trading

It is prohibited to trade any shares of EUROAPI or its subsidiary companies while possessing non-public information likely to significantly affect the market value of these shares.





Insider trading occurs when a person trades in a company's securities while aware of material non public information about that company (inside information).

The most typical examples of insider trading are selling shares before bad news causes the share price to drop or buying shares before good news causes the shares to go up.

EUROAPI considers an insider any individual possessing significant confidential, price-sensitive information regarding EUROAPI, its affiliates and listed partners.

Consequently, insiders must abstain from trading shares of the relevant company and, in particular, from selling performance shares and from exercising options.

Inside information refers to non-public facts, knowledge and data among which:

- ⇒ Financial results
- ⇒ Proposed acquisitions or divestments
- ⇒ Issuing marketing approval for a new product
- ⇒ Losing or gaining a major contract
- ⇒ Losing or gaining ongoing litigations

The rules on insider trading apply not only to EUROAPI shares, but also to the shares of any third party with which the company has a relationship.

If additional guidance or clarification is needed on the applicable rules, employees can consult the Global Insider Trading procedure

At EUROAPI, WE MUST:

- ✓ Comply with laws and regulations that apply to insider trading, whatever our position is in the organization.
- ✓ Disclose confidential information strictly on a need-to-know basis. We should be wary of chain mails and conversations in public spaces, such as trains, planes, restaurants, conferences, open space environment.
- ✓ Ensure that the third parties preserve the confidentiality of the information we provide to them, in particular by use of confidentiality undertakings or clauses.
- ✓ Preserve the confidentiality of information we may have received from third parties.
- ✓ Realize that information not material to EUROAPI may be material to our partners.
- ✓ Consult the Legal Department before buying or selling shares, if in doubt.

Participating in public life

EUROAPI operates with transparency, honesty and integrity when participating in public life.

No employee or representative of EUROAPI may act or speak on public matters as a representative of the company without authorization.

EUROAPI employees may engage in public life independently as long as their participation is clearly a personal endeavor with no connection to EUROAPI.



As a corporate citizen, EUROAPI is involved in the public life of the countries and regions where it operates.

In each of these efforts, we always seek to make a positive contribution to public life and never conceal our activities. We always act in accordance with applicable laws.

We welcome the participation of our employees in public life in their personal capacities. To avoid misunderstanding, employees must make clear that they are participating as a personal endeavor, not on behalf of EUROAPI.

Only authorized employees may speak for the company in public. No EUROAPI employee or representative has authority to commit the company to support a political party, politician, or electoral candidate in any way, or to use an association with EUROAPI in political activities.

Should you need additional guidance on the rules to follow, you can consult the External Communications Global procedure

At EUROAPI, WE MUST:

- ✓ Participate in public activities with transparency, integrity and honesty.
- ✓ Present ourselves as representing EUROAPI only when we are authorized.
- ✓ Clarify that we conduct any participation in public life in a personal capacity and on our own behalf, not as a EUROAPI representative.
- ✓ Make clear the expressed opinion is your own only and does not represent the position of EUROAPI.
- ✓ Seek advice, if in doubt, from External Affairs first, the Human Resources Department, the Legal Department, or the Ethics and Compliance Department.

Protecting our image when using social media

Social media must be used responsibly.

In recent years, the use of social media has become part of our daily life. Posting or commenting on online content can easily affect the image and reputation of our company, employees or business partners. Therefore, you must use social media responsibly. Remember that only designated employees are authorized to communicate on behalf of EUROAPI about our company or products on social media.



Protecting the company's image and reputation requires you to use social media appropriately, both professionally and privately. This requirement applies to all digital media that can be used interactively, such as social networking sites (e.g., Facebook®, LinkedIn® and X®), blogs, and photo/ video sharing sites (e.g., YouTube®, Flickr®), wikis and forums).

Before posting online content or taking an action on social media (e.g., shares, likes, rates), even in private use, remember that this activity could be attributed to EUROAPI and consequently affect negatively EUROAPI's image and reputation.

Should you need additional guidance on the rules to follow, you can consult the External Communications Global procedure

At EUROAPI, WE MUST:

- ✔ Keep in mind that any information posted on the internet could affect the persons mentioned and EUROAPI's image and reputation.
- ✔ Act responsibly when disclosing information, statements or opinions on social media. Do not comment or discuss content about activities of EUROAPI, health authorities or competitors, posted by third parties or the general public.
- ✔ Report any negative comment or web discussions about problems associated with EUROAPI products to the Communication Department.
- ✔ Refer media requests to the media relations team.
- ✔ Contact the appropriate manager or the relevant communication team if you have any questions about the policy.

To go further



Confidential information/ insider trading: You are working on a very confidential project and your employer put you on the insider list. During a dinner with friends, you disclose some information about the project and you recommend them to buy shares as you think the project will boost the price. How to analyze such situation?

Never share any confidential information outside the company as it may be subject to sanctions (including criminal proceedings).

In addition, as an insider you shall never trade / recommend to trade shares during a certain period of time. In case of doubt, contact legal and/ or ethics and compliance.

Public life/ social media: An employee publish a defamatory statement towards an authority on a social media and points out that such authority has been unfair toward the company during the last inspection performed. What is wrong with such behaviour?

Firstly, when employees express personal views on social media, they should make sure that they do not express on behalf of EUROAPI. Secondly, if you intend to talk on behalf of EUROAPI you must always get prior approval from Communication department.



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Version e-accessible par **ipedis**

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