



## CODE OF ETHICS

# SUMMARY

## 01.

---

### UNDERSTANDING OUR ETHICAL COMMITMENTS

- 6-7** **A. Our Code of Ethics**
  - 1. Objective
  - 2. Aims
  - 3. Our responsibilities and key values
  - 4. Application
- 8-9** **B. Scope of this Code of Ethics**
  - 1. Making good decisions
  - 2. Right to report
- 10-11** **C. Communicating Responsibly**
- 12-13** **D. Fundamentals**
  - 1. Human rights
  - 2. Environment

## 02.

---

### DOING BUSINESS ETHICALLY

- 15-19** **A. Upholding Laws and Regulations**
  - 1. Conflicts of interest
  - 2. Fair competition
  - 3. Market-specific rules
  - 4. Working with governmental and public bodies
  - 5. Third parties and suppliers
- 20-24** **B. Behaving Honestly**
  - 1. Controlling and preventing money laundering
  - 2. Illegal payments
  - 3. Gifts and entertainment
- C. Applying Company**

- 25-29** **Regulations**
  - 1. Compliant documents
  - 2. Privileged information and insider trading
  - 3. Cybersecurity
  - 4. Intellectual property and confidential information

## 03.

---

### WORKING TOGETHER ETHICALLY

- 31-33** **A. Respect, a Key Value**
  - 1. Diversity and inclusion
  - 2. Non-discrimination
  - 3. Equity and respect
- 34** **B. Health and Safety**
- 35** **C. Confidentiality and Data Privacy**

## 04.

---

- 37** **GLOSSARY**

---

## Foreword

As a young company specialising in renewable energy, Entech is at the heart of green transition and so has an important role to play in the transformation towards a more sustainable economy.

We believe that ethical and responsible behaviour is key to our long-term success and our commitments to our partners.

This Code of Ethics sets out the fundamental values and principles that will guide our company's actions and behaviour.

It provides a clear framework for just and fair decision-making, protecting all stakeholder interests and safeguarding our reputation as a responsible and respectful company.

We are committed to respecting current laws and standards, protecting the data and private lives of our partners, and implementing fair practices in all our commercial activity.

We respect the principles of environmental, social and economic sustainability, and we commit to transparent working with stakeholders, to promoting efficient energy use and to contributing to a more sustainable future for the generations to come.

I am very proud to affirm this commitment on behalf of Entech to help build a greener, more responsible world.

Together we will build a technologically sustainable and responsible future for all.



Christopher Franquet  
President and CEO, Entech

# 01.

UNDERSTANDING  
OUR ETHICAL  
COMMITMENTS

# A. Our Code of Ethics

**At Entech we are extremely proud of our employees and of their diversity and commitment to our shared values of Innovation, Performance and Well-being.**

## A.1 Objective

**All Entech employees share a strong sense of integrity and a very specific commitment to sustainable development.**

Our ethics guide our daily behaviour as we market our solutions commercially. This Code of Ethics sets out our firm commitment to integrity, both collective and individual, and provides theoretical and practical advice for employees, suppliers, and partners on the way we conduct business.

Entech sits at the heart of energy and green transition in an ever-evolving world where the technology we provide contributes to improving the environment. Our business activity is governed by laws and regulations that can be complex and often confusing. At this time of fast and exciting change, we want our Code of Ethics to provide a

firm foundation testifying to our constant unflinching commitment to be responsible and act with integrity.

The Code of Ethics does not replace internal company regulations. Entech employees should refer to company regulations, procedures, and instructions in carrying out their work. This Code of Ethics demonstrates our desire for transparency. It does not replace company regulations but gives context by illustrating their principles and purpose.

This Code of Ethics is not exhaustive in scope and its content is subject to development. As such, Entech reserves the right to modify it at any time and without prior warning, and to act proportionately in dealing with the situations concerned, in accordance with the principles set out within it.



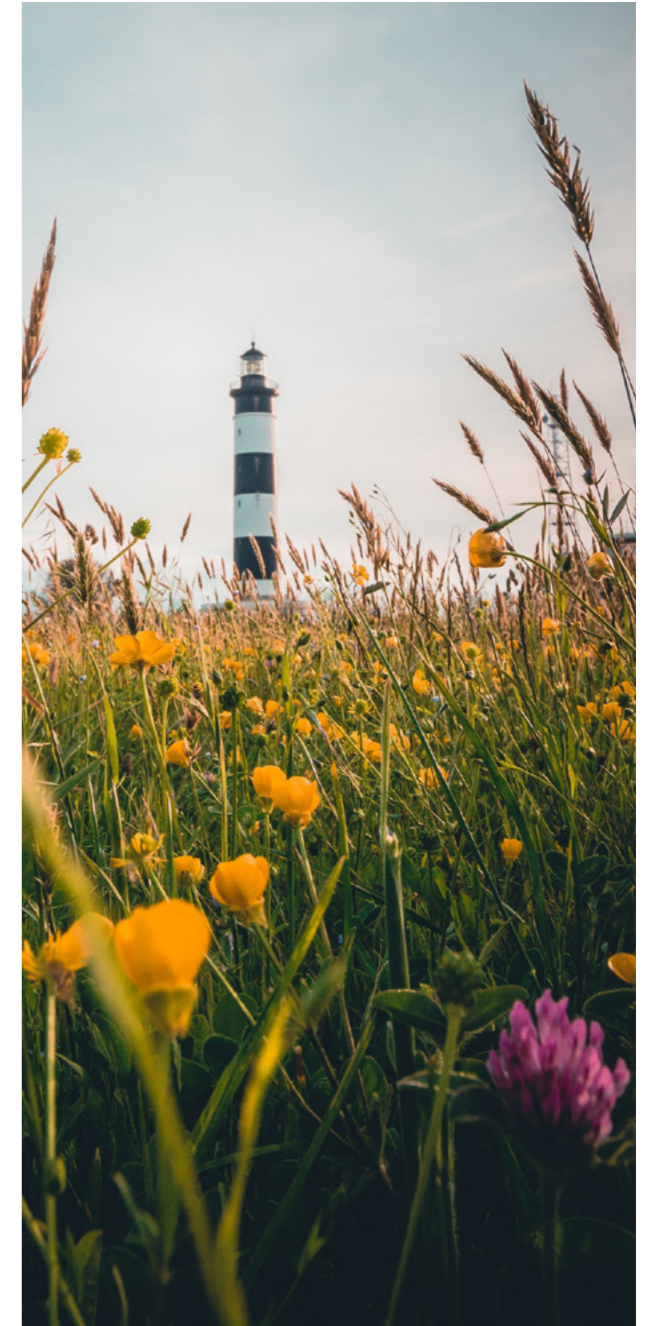
## A.2 Aims

This Code of Ethics applies to all of Entech's employees, managers, directors, and subsidiaries. It also applies to every employee of any joint venture or other entity in which Entech holds a majority share or exercises effective control, for example by means of a management board.

Entech will aim to ensure that its suppliers, partners and other representatives recognise and adhere to this Code of Ethics or to a similar set of guidelines governing integrity and compliance.

## A.3 Our responsibilities and key values

- › We obey the law.
- › We behave ethically and responsibly.
- › We work safely and sustainably.
- › We build mutual trust with stakeholders.
- › We protect the company and its reputation.
- › We act with integrity and respect.
- › We have the right and obligation to report concerns.



## A.4 Application

**This Code of Ethics may be modified to accommodate changes in context, particularly regulatory change.**

Effective from 01 March 2023.

## B. Scope of this Code of Ethics

### B.1 Making good decisions

Any of us may face situations where we are not sure of the right decision to take.

When employees are unsure whether an action is in line with Entech ethics and compliance, they should do the following:

#### When in doubt

If the answer to any of these questions is "no" or if there is any doubt about the answer, you should speak to one of the following people:

- › Your line manager or another manager
- › Entech senior management



### B.2 Right to report

**If a situation at work does not seem quite right, or if you become aware of any situation or behaviour that seems to conflict with this Code of Ethics, we encourage you to ask questions and share your concerns.**

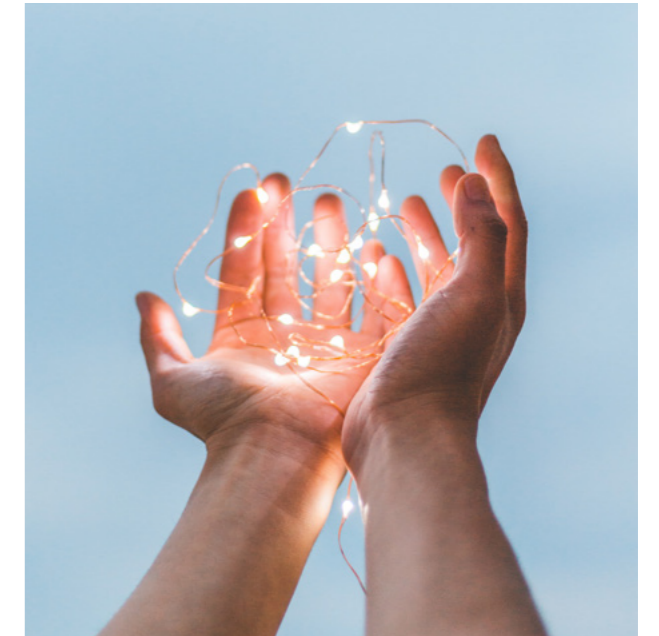
Speaking up is always the right decision, even when you are not sure whether a breach of ethics has taken place. This allows us to identify potentially damaging situations and quickly find an appropriate solution.

If after this you feel that you need to formalise your concerns, you have the legal right to report them. All details relating to your right to report are set out in Entech's whistleblowing procedures: "PROC\_0045\_A\_Gérer les signalements" (Managing reporting).

What happens next?

Whichever method you have used to report your concerns, we will reply to you as quickly as possible. Once we have evaluated the specific circumstances of the situation, if necessary we will carry out an investigation.

We take all reports of concerns very seriously and they will be treated confidentially to the full extent permitted by the law. We remind you that all employees have the responsibility to cooperate in any ongoing investigation resulting from a report of inappropriate behaviour.



#### Who should I talk to about my concerns?

##### Speak to:

- › 1. Your line manager
- › 2. A Social and Economic Committee (CSE) representative
- › 3. The company Compliance Officers

What about retaliation?

It is extremely important to us that you feel comfortable to share any concerns you may have. We will not tolerate any kind of retaliation or attempted retaliation against anyone who has reported a possible infraction or taken part in an inquiry. The French law known as "Sapin II" provides additional protection to whistleblowers.

## C. Communication

**We communicate respectfully, honestly, transparently, and professionally. We communicate in a way that reflects our reputation and brand image as an innovative and high-performing company, committed to well-being. In all communications, internal and external, by whatever medium, we protect confidential data and provide complete and accurate information.**

We cannot control all communications, but we can ensure that the message we communicate about Entech is accurate and consistent. For this reason, only a limited number of people are authorised to make public statements on the company's behalf.

This helps us to protect our reputation through consistent and trustworthy messages.



### Providing information about Entech

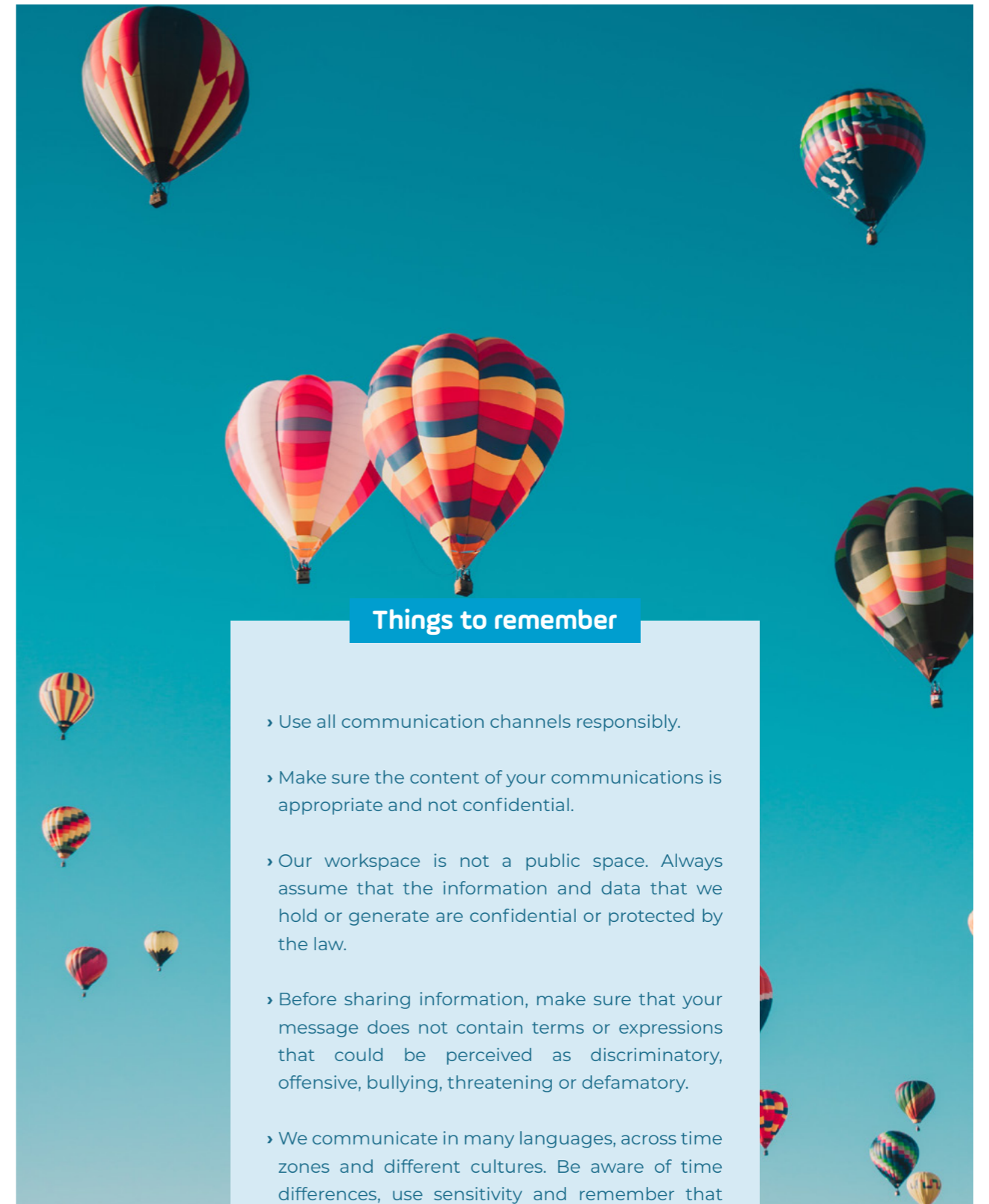
Even seemingly positive or helpful comments can sometimes inadvertently:

- › Misinform our customers, investors, or the general public
- › Divulge confidential information or elements of intellectual property
- › Promise things without delivering them
- › Breach the Code of Ethics or other company rules
- › Damage our reputation

If you receive a request for information about Entech, do not reply to it yourself unless you have been authorised to do so. Pass it to the designated spokesperson as guided by your line manager.

### Things to remember

- › Use all communication channels responsibly.
- › Make sure the content of your communications is appropriate and not confidential.
- › Our workspace is not a public space. Always assume that the information and data that we hold or generate are confidential or protected by the law.
- › Before sharing information, make sure that your message does not contain terms or expressions that could be perceived as discriminatory, offensive, bullying, threatening or defamatory.
- › We communicate in many languages, across time zones and different cultures. Be aware of time differences, use sensitivity and remember that someone who speaks another language may interpret your message differently.



## D. Fundamentals



### D.1 Human rights

**Everything that we do must respect individuals and their fundamental rights and we must never allow our business activity to compromise those rights.** Help us to respect all the laws prohibiting harmful activity such as forced labour, child labour or human trafficking.

We uphold the principles contained in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, anti-slavery laws and all other similar laws and guidelines. We expect our suppliers, subcontractors, and other business partners to adhere to similar regulations and to respect all international regulations on working hours and conditions, discrimination and equality, child labour, equal pay, forced or compulsory labour and modern slavery.

#### Things to remember

- › When you are at a site, you must immediately inform senior management of any suspect working practices.
- › Think about the impact that a potential Entech project could have on human rights in the region where it is to be carried out.
- › We expect all of our business partners to uphold the same commitment towards individual rights. Before working with a potential business partner, you must undertake all reasonable evaluation to ensure that they comply with the law, treat all of their employees with dignity, and respect their fundamental rights.

### D.2 Environment

**We all share responsibility for preserving and protecting the environment.** You can help us to have a positive impact on the environment by working to go beyond environmental requirements in the workplace.

Entech complies with all applicable environmental laws and regulations in all the countries where we do business. Entech also adheres to a proactive policy on social and environmental responsibility. Entech is committed to ongoing improvement in all of these areas by constantly finding ways to reduce emissions, cut the use of hazardous substances, save water and energy, and play an active part in combating the effects of climate change.

#### Things to remember

- › Our commitments go beyond existing laws and regulations. We aim to manage our environmental footprint transparently and ethically, to the benefit of our stakeholders, customers, employees, investors, and the communities in which we operate.
- › We expect our suppliers and business partners to share these environmental commitments.
- › We must immediately report environmental situations that we believe are unacceptable to ensure that corrective and preventive measures can be put in place.
- › We will find ways in which Entech can reduce the environmental impact of its products and services throughout their life cycle, including product design, procurement, materials and end-of-life.
- › We expect our employees to be familiar with Entech's sustainable development policy.



# 02.

## DOING BUSINESS ETHICALLY

### A. Upholding Laws and Regulations

#### A.1 Conflicts of interest

We work as a team and all our decisions must be objective. We must never allow personal interest to affect our judgement. If any personal relationship, external employment or financial investment could affect your decision-making, this constitutes a potential conflict of interest. Equally, a conflict of interest could arise if you or a family member benefit from an unfair advantage as a result of your employment with the company. It is vital to identify and avoid such conflicts of interest and to remember that even the appearance of a conflict of interest could damage Entech.

We commit to always acting in the company's best interest.

- › We only use company property, whether tangible or intangible, for appropriate and legitimate purposes. Consequently, all decisions must be made independently of any personal interest.
- › We immediately disclose any personal or professional interest that could reasonably be perceived as contrary to Entech's interests, give the appearance of impropriety or affect our judgement in carrying out our work.
- › We avoid external commitments or activities that could interfere with our responsibilities at Entech or harm Entech's reputation.

#### Things to remember

- › A conflict of interest may be perceived or real. Ask yourself whether a colleague with knowledge of your personal interests could reasonably question the integrity of your decisions
- › A potential, or real, conflict of interest is not a breach of the Code of Ethics in and of itself, but not mentioning it or deliberately omitting it is.

#### Example

A conflict of interest may arise in a seemingly unimportant situation, such as:

- › having a close family member who works for a supplier, customer or competitor;
- › sitting on the board of a charity that Entech donates to or could donate to.





## A.2 Fair competition

Entech's success must be the result of open and fair competition.

We believe that our success rests in the creativity and expertise of our employees and never in unfair or anti-competitive practices.

We adhere to competition and anti-trust laws that protect fair trade by prohibiting anti-competitive behaviour. These laws prohibit any agreements restricting competition between businesses at all levels of the supply chain.

### Example

We treat our competitors ethically. If your role requires you to attend professional meetings or industry events, you may meet our competitors. You should avoid any topics of conversation related to competition, such as general conditions governing our contracts, offers or prices. The mere appearance of an agreement or inappropriate understanding between competitors can result in lengthy and costly government enquiries.

### Things to remember

- › Be familiar with the law (or laws) to ensure healthy competition in the market. All these laws require us to act honestly and with discernment in our dealings with competitors, customers, and business partners.
- › Any discussions, agreements or understandings (direct or indirect) with a competitor on price, product distribution, markets, territories, customers or offers, or on production restrictions or potential collective boycotts, are illegal.
- › It is also illegal to discuss any information on pricing, volume or other competitive policies.
- › You may not obtain or share with competitors any commercially sensitive information, that is, any information that could influence the business decisions of Entech or a competitor (for example, costs, margins, pricing data, strategies, product plans).
- › You may not require a customer to resell your products at a specific price.
- › You may not falsify tenders by agreeing not to tender or by deciding the results of a tendering process in advance.
- › Contravening anti-trust and anti-competition laws is a serious matter that could result in legal action being taken against you and the company, seriously damaging your reputation and that of Entech.
- › Gather competitive information with care. When you are researching competitors, remain fair. Only use publicly available information. Reject any information obtained inappropriately, for example, confidential information shared by a customer, former employee or other third party.



## A.3 Market-specific rules

We work in many different countries and are subject to various export and international business laws. Make sure you are familiar with these laws or seek legal advice, and comply with them in all international transactions to avoid any inappropriate or illegal agreements.

### Things to remember

- › If you organise imports or exports, even on an occasional basis, you must follow the laws of the countries concerned. Even small transactions (low volume, low cost, or even free replacement items and/or goods carried for the supply of services) are covered by trade regulations.
- › Import and export documentation must be completed correctly and accurately and be retained in accordance with regulations.
- › Exports can take many forms and do not just apply to physical goods. An export can occur when you transport electronic equipment containing data across a border, but also when you transmit this information electronically or upload it to a shared workspace that others can access.
- › Many countries restrict the export and transfer of particular data and technologies. Some countries specifically forbid doing business with certain other countries (embargos). Review all such transactions to ensure that they do not conflict with applicable trade sanctions and that the necessary government authorisations are in place.
- › Make sure that the end use has been confirmed, that there have been no facilitation payments and that no countries under embargo are involved in the transaction.

#### Laws governing international commerce include:

- › Economic sanctions
- › Anti-money laundering measures
- › FCPA (Foreign Corrupt Practices Act)
- › UK Bribery Act
- › Anti-corruption measures
- › Counterterrorism financing measures
- › Import regulations
- › Trade compliance regulations
- › Export control measures

#### Only work with ethical partners

When selecting business partners, make sure that you never work with entities that are subject to sanctions or restrictions. Ensure that all partners respect the highest ethical principles and are not listed on a country's restricted or prohibited business lists, particularly as concerns the United States. Laws can change over time. Ensure that you monitor regulations or speak to the person in charge of doing so.



#### A.4 Working with governmental and public bodies

We may work on important projects with international organisations, national, regional or local governments, or their representative bodies. We may also sell to governments and to state-owned companies.

As a result, we are subject to the laws of those governments or the internal regulations of the organisations we do business with.

In dealing with governments, state-owned companies and their representatives, or with international organisations, we will always act transparently, honestly and according to the highest standards of integrity, in accordance with current laws and regulations.

We must be particularly careful when dealing with civil servants or official representatives, as much stricter rules apply in these cases.

#### Things to remember

- › We are responsible for understanding and adhering to the laws and regulations governing the countries where we do business.
- › Entech finances, goods or services must not be used to make political donations or support any political candidate, party or committee, wherever they may be located.
- › Governments and state-owned companies often have complex and specific regulations governing their procurement and tendering processes. Find out in advance what the regulations are, and always follow them to the letter.
- › Certain private sector trade practices may not be legal or appropriate in the public sector or when dealing with state-owned companies.
- › Governments impose criminal and civil penalties (as well as possible disqualification) for violations of procurement, ethics, lobbying, and related regulations.

#### A.5 Third parties and suppliers

We aim to work with suppliers and partners who share our commitment to integrity. We follow procurement procedures throughout the qualification, contract and supplier management processes. Our processes are transparent and

competitive, and we treat our suppliers fairly and responsibly. We do not accept gifts or items of value from our suppliers, as outlined in our policy on gifts, entertainment, and hospitality.

#### Things to remember

- › We expect our suppliers to respect human rights in their business operations, including complying with laws prohibiting child labour and forced labour, and modern slavery. Our suppliers must respect workers' rights and employment standards.
- › We expect our suppliers to provide their employees with a safe and healthy working environment and with working conditions that meet environmental standards.
- › We quickly take action against suppliers whose ethical conduct may be suspect or does not conform to our Code of Ethics. We do not underestimate, ignore or minimise ethical failings when assessing supplier performance.
- › Relationships with individuals or businesses should be based solely on the criteria outlined in fair and transparent consultation rules. The business decisions that we take on behalf of the company must not be influenced by personal factors or family interests.
- › Suppliers owned or controlled by a governmental organisation, or representatives of government making allegations that would give them undue influence, should be examined extremely critically.
- › Stay alert: monitor performances of these third parties to be sure that they are respecting the principles of our Code of Ethics and applicable laws.
- › Speak up. If you suspect behaviour from a third party working with us or on our behalf, that fails to meet our Code of Ethics, you should report it. If you are unsure about a specific situation, ask for advice.
- › All goods and services must be purchased in line with our procurement policies and procedures.
- › Inform management immediately of any attempt to force you to use a specific supplier or any requests for exceptions to Entech procedures when selecting or managing suppliers.
- › Be wary of any suppliers who suggest that they could bypass or speed up government authorisation for their goods or services (for example, customs regulations).
- › Do not allow suppliers to offer you any item of value.
- › Bribery is illegal and contravenes our Code of Ethics. Inform management of any attempt at bribery.
- › Ensure that the suppliers you oversee take immediate and effective measures to correct any shortcomings observed during visits, audits or other inspections.

## B. Behaving Honestly

### B.1 Controlling and preventing money laundering

Money laundering is a serious offence committed when funds are generated through criminal activity such as tax fraud, drug trafficking or terrorist activity, but the origin of these funds is concealed by legal activity. Help us to prevent criminals ever use us for these purposes.

#### Who is guilty of money laundering?

Money laundering is often carried out by:

- › Terrorist organisations;
- › Tax fraudsters;
- › Drug traffickers or those who receive money from illegal activities.

As a publicly listed company, we accurately register and declare our finances, transactions and assets.

We obey all laws governing our financial information, accounting and tax obligations. We also obey all anti-money laundering legislation and guard against any financial transactions that could be intended to conceal the proceeds of criminal activity.

We protect Entech's property, assets and data against any inappropriate or unauthorised activity and take careful steps to avoid their loss, theft or damage. We use Entech's assets for legitimate business purposes.

#### Things to remember

- › Make sure that all business transactions are registered in accordance with Entech policy, company accounting guidelines and internal procedures, and that they comply with all applicable legislation.
- › Do not sign any approval or other document without first ensuring its accuracy and make sure that the underlying transaction serves a legitimate Entech commercial or contractual objective.
- › Do not alter or destroy any records that you are responsible for keeping.
- › Be aware that inappropriate or fraudulent documents or reports are illegal and could place you and Entech at risk of civil and criminal proceedings.
- › You are responsible for safeguarding and using Entech assets appropriately.
- › **Report any potentially suspect transactions, including, but not limited to:**
  - › Requests to Entech to pay by cash or by instalments in a foreign currency just below the declaration threshold for foreign currencies in that country.
  - › Requests for payment to a new special account or personal bank account.
  - › Requests from a supplier to make an initial payment to an offshore bank account or to a destination known to be a tax haven.
  - › Payment requests via an entity established in another country or via a third party.

#### Example

**Use the following criteria to help you decide whether gifts, entertainment or expenses are appropriate:**

- › **Given for an appropriate reason:** the gift or entertainment should be given as a sign of appreciation, friendship, or hospitality;
- › **Without obligation:** the gift, entertainment or payment of expenses should not obligate the recipient in any way;
- › **Without expectation:** the gift or entertainment does not create any expectations of the donor or any of their associates;
- › **Given openly:** gifts given secretly may suggest something improper;
- › **No expense abuses:** paying or reimbursing expenses may not be undertaken inappropriately to hide inappropriate gifts or entertainments;
- › **Appropriate:** the gift, entertainment or expense should be appropriate and conform to general business practice, cultural norms and local practice;
- › **Legal:** it must be permitted by the laws of the country where it is given and all other applicable laws;
- › **Meet the recipient's guidelines:** the gift, entertainment or expense reimbursement must comply with the regulations or code of conduct of the recipient's business or organisation;
- › **Infrequent:** the giver and recipient should not exchange items regularly.



### B.2 Illegal payments

We only accept fair competitions where the results are based solely on the merits and performance of Entech and its employees. We do not offer or give any item of value to any private individual, public official, or charitable or political organisation, for any illegal, corrupt or improper purpose, or to facilitate any routine government service. Neither do we authorise or tolerate any third party, such as suppliers or partners, to do so on our behalf. We only establish business relationships with trustworthy partners who share our ethical standards. Everything that we do must respect individuals and their fundamental rights and we must never allow our business activity to compromise those rights. Help us to respect all the laws prohibiting harmful activity.

The consequences of verified corruption or illegal payments may be extremely severe, and cause harm to the company, which may be subject to criminal proceedings.

Help us to keep Entech free of this kind of behaviour by enforcing the applicable anti-corruption laws, and never offering or accepting any illegal payments, bribes or backhanders.

Different countries have different anti-corruption laws. Find out about the laws applicable to our

business activity in the countries where you do business.

If you know of any information relating to an offer or payment or the granting of any other undue or illegal advantage, contact Entech's management immediately.



### Things to remember

- › Bribery, corruption or inappropriate payments can take many forms, including gifts, entertainment or hospitality, payments by third-party intermediaries or business partners, or donations to organisations affiliated to the government or to customers.
- › Gifts, entertainment, and invitations may only be offered if they are in line with Entech's company policy.
- › Monitor third parties who are involved in marketing and sales activities or who represent Entech's brand.
- › Employees of state-owned companies are considered to be government representatives for the purposes of anti-corruption legislation.

**Be especially careful with such representatives or officials of public or governmental bodies. The regulations for representatives or officials of public or governmental bodies are particularly strict. If you offer any item of value to a civil servant, or a representative or officer of a public or governmental body, or accept their request for payment to speed up or facilitate a specific process, you could be guilty of breaking current anti-corruption laws.**

### Be vigilant and immediately inform management if you suspect any improper payment in a business relationship, such as:

- › Engaging any third parties who do not appear to add legitimate commercial value or have not been through the Entech procurement process;
- › Extravagant sales commissions, or bogus fees or discounts;
- › Commercial documents or records of transactions where services are vague or include unclear descriptions, or any request to inaccurately document a transaction, or suggestions that a third party may have undue influence on a customer's decision-making;
- › Be careful of requests for donations to charitable organisations or organisations that could be affiliated to a customer or a government representative;
- › Refuse any request from a civil servant or government representative for a "grease" or "facilitation" payment as a condition for obtaining routine government services or benefits to which everyone is normally entitled;
- › We must know and apply the laws of the countries where we operate.



### B.3 Gifts and entertainment

**We build relationships based on honesty and integrity, and never as a result of improper inducements.**

In business, there is a long tradition of giving gifts and entertainment. While such practices are a sign of goodwill between partners, they can also be used to influence people. An offer or favour which could influence a decision has gone too far.

Consider any offers carefully. We rely on your discernment in your dealings with business partners. Never allow a gift or favour to influence your business decisions, and never try to influence anyone. Breaches of the gift policy will be taken very seriously and could result in disciplinary measures. We completely understand that at times it may be difficult to distinguish between an acceptable business favour and an inappropriate offer.

Be particularly careful with civil servants and official representatives. The rules governing these types of situations are particularly strict. If you are required to deal with a civil servant or other representative of a public authority or public service, never offer, promise or give them anything of value. It could be interpreted as an attempt to obtain personal advantage or encourage them to do something inappropriate. Remember that it is sometimes difficult to identify who is a civil servant or a representative of a public authority or public service (for example, employees of public hospitals, banks, public institutions, or media networks). If you are unsure, talk to your line manager.



## C. Applying Company Regulations



### C.1 Compliant documents

We are a publicly listed company. Our records must always reflect our business activity and financial situation accurately and faithfully. They must be clear, complete, and timely, to help us take responsible decisions, and provide reliable forecasts and statements. Be cautious and honest. Whenever you are dealing with Entech's commercial or financial data, make sure that you are always honest and accurate. Always allocate costs accurately and never falsify information. Never record or authorise misleading entries in our accounts or our financial or commercial documents.

Entech prohibits any funds, assets or liabilities not recorded in official accounts, as well as any specific invoicing or payment procedures suggestive of tax fraud.

Keep our records and documents responsibly. An important aspect of financial integrity is correct accounting and record-keeping, from start to finish,

including updating, retention, and disposal. Follow record retention, archiving and disposal procedures for all files and documents. Never dispose of a document that may be subject to a litigation hold for legal or statutory reasons.

Be alert and speak up. Look out for possible signs of corruption, fraud or money laundering in our accounts (for example, fraudulent entries, false declarations or serious omissions).

Such documents may include expense slips, customer or supplier invoices, purchase orders, payslips, employee time sheets, financial reports, benefit claims, business plans, or customer or supplier contracts.

## C.2 Privileged information and insider trading

We protect nonpublic information and never use it for personal gain.

When buying and selling securities, we all try to make our decisions as carefully as possible. However, if these decisions are influenced by material nonpublic or “inside” information about a given company, this is illegal insider trading. Know the law on insider trading and follow it scrupulously whenever you buy or sell stock in a company.

**Protect internal company information.** As an Entech employee, you may have access to privileged company information about Entech or our business customers or partners. You may also be given nonpublic information by a friend or family member. In each of these cases, you are classed as an “insider” and you are forbidden to trade or advise others about trading stock or securities on the basis of material nonpublic information that has not yet been released.

What is material nonpublic information? Material nonpublic information includes anything that could be sufficiently important to potentially influence investment decisions as regards buying, selling and retaining the securities concerned.

This information includes projected future financial earnings or losses, prices, proposals, changes in personnel, mergers or acquisitions, unannounced allocations to suppliers, nonpublic information on new products or services, or any other nonpublic information, which, if divulged, could influence any person to buy, sell or hold any company’s stock. We never share such information with anyone who does not have the right to know about it.

Acting on this type of information or providing it to anyone else harms the integrity of the market and could be illegal.



### Things to remember

- › Financial market regulations prevent anyone who is in possession of nonpublic information from using this knowledge to trade stock and from disclosing this information to a third party.
- › As employees, you may regularly have nonpublic information about Entech (some of which may be material information).
- › Trading securities such as stocks, bonds or options while in the possession of material nonpublic information is unethical and illegal.
- › It is illegal to share nonpublic company information.
- › You must never pass on “tips”. The same rules apply to sharing company information with any other person. Whether or not you have traded on the basis of this information does not matter. The very fact of having shared it with someone else, even a member of your family or friends, makes you guilty of breaking the securities law. Avoid even the appearance of illegally communicating information.

## When can I trade securities?

Unless you have been told otherwise, you may only use inside information to buy or sell securities once that information has been made public, for example, through regulatory filing (such as the publication of quarterly accounts), a press release, or any other official announcement.

### Things to remember

- › Use social media responsibly. Inappropriate posts or unauthorised sharing of information (for example, images, comments, links or other data) could harm your reputation and that of your colleagues, Entech, and our customers. If you are not sure, contact Entech’s Communications department.
- › You may use Entech’s information technology and tools for limited personal use, provided that this does not conflict with Entech’s interests.
- › Cyberattacks generally aim to steal data or render systems unusable, and can cause significant damage, including to our partners and other stakeholders.
- › Infected systems can seriously harm our own information systems. Peripheral storage devices, such as USB sticks, can contain malware and put our systems at risk. They should be used extremely carefully.
- › Information that is produced and saved on Entech information systems is a company asset. Entech reserves the right to monitor use of all information systems.

## C.3 Cybersecurity

As a company, we use many different types of information technology. We recognise that using these technologies and associated systems, such as email, software, networks, apps, the internet, and social media, can expose us to cyberattacks or other internal or external threats.

We have a duty to use this technology responsibly for legitimate purposes and according to Entech’s interests.

- › Never download, access or install any software that you are not authorised to use onto Entech systems.
- › Only save appropriate content to devices supplied by Entech, such as cellphones, laptops or other electronic devices.
- › Protect your passwords and never share them with anyone else.
- › Use Entech accounts, and not personal accounts, for all business and contractual communication and for saving Entech data.
- › If you become aware of a possible cyberattack or any other behaviour that could harm Entech systems, you must immediately inform the IT department.
- › Be careful when opening emails from unknown sources. Never open attachments or suspicious links that could compromise Entech information systems. Report any such emails.

## C.4 Intellectual property and confidential information

Our business is based on the assets and resources that allow us to differentiate ourselves from our competitors. We have a responsibility to protect these assets and resources.

Entech provides all the necessary tools to enable us to carry out our work. Whether these are software programs that we use daily, or our buildings and equipment, these shared resources allow us to produce quality work for our customers.

Work responsibly. Look after the resources and assets entrusted to us. Protect them from theft, inappropriate use and loss.

Our assets take various forms. They may be tangible items that you can see, or less tangible assets.



### They include in particular:

- › Physical assets – such as our facilities, machinery and equipment, our financial resources and other financial assets, as well as our office equipment, vehicles, tools and materials.
- › Intangible assets – such as our electronic data, emails and voice messages.
- › Partner, co-contractor and customer data.
- › Intellectual Property (IP) – such as our trading names, logos, trademarks, patents, creative ideas, and other copyrightable subject matter. This also includes anything you may make or design during your employment with Entech.

We place great importance on protecting the confidential information entrusted to us.

Creativity and innovation are at the heart of our business activity. We are committed to keeping this information safe to protect our competitive advantage and our reputation.

### Keep information confidential.

If confidential or private information were to be shared, it could help our competitors and damage our customers and the company. If you are party to this type of information in your role, help us proactively to protect it.

Confidential information includes all nonpublic information about Entech as well as certain information about our customers or business

partners that we may have access to as part of our work. It can also include information about:

- › Our business – marketing strategies, business plans, product and service development;
- › Our finances – prices, offers, forecasts, or product and service costs;
- › Our business operations – changes in leadership or merger/acquisition strategies;
- › Our customers – details of our projects, systems, processes, transactions, and financial affairs;
- › Our partners – rates and general contract terms and conditions.



## Things to remember

- › Use good judgement in your work. Only access information that you need to carry out your work. Never share Entech's confidential information with your customers, partners, or anyone else inside or outside of the company, unless they are authorised to access this information and need it to carry out their work. If you are not sure whether certain information is confidential or whether you have the right to share it, ask your line manager for advice.
- › Be careful what you say. When you are posting on social media or speaking publicly, take care not to reveal any confidential business information. Sharing this type of information with friends or family members or in public places like restaurants, elevators, or on public transport, can be enough to risk information being disclosed and used inappropriately.
- › All of our dealings with our customers and business partners are based on trust. They trust us to work conscientiously and to protect the sensitive information they provide to us, including personal data. They expect us to keep this information confidential and respect their private lives. The same principle applies to our employees, customers, and partners and to all personal information they may give us.
- › Help us meet our commitments by complying with all confidentiality agreements and declarations in place to prevent the disclosure of any confidential information.

## 03.

WORKING TOGETHER  
ETHICALLY

## A. Respect, a Key Value

## A.1 Diversity and inclusion

**At Entech, we are extremely proud to be building a diverse and inclusive community. Each of us has a role to play in strengthening that community by respecting each individual's history and culture and by demonstrating fairness in all decisions and interactions. Help us to promote a culture of inclusion based on our shared values.**

Together, we aim to create a welcoming environment that values diversity of thought, culture, experience and perspective. This diversity helps us to find creative solutions to the problems we face and to provide ever more innovative solutions for our customers.



Always be careful to avoid any unconscious bias.



Organise and use our resources in a way that takes full advantage of the potential offered by our different cultures. Include new ideas and perspectives in your work and group projects and ensure diversity of age, gender, gender identity/gender expression, race, ethnicity, religion, language, political affiliation, sexual orientation or physical ability.



Respect the diversity of our stakeholders and third parties. When we talk about inclusion, we are not referring only to our employees.



We work with a very wide range of contacts, and our relationships with them should always be based on mutual respect. Always be careful to act fairly with all people and entities at all times.



## A.2 Non-discrimination

**Our company activity is based on teamwork, cooperation, and a commitment to equality of opportunity at work. We do not tolerate any kind of discrimination or unfair treatment.**

Be objective. Remember that we place great importance on equality of opportunity at work and discrimination has no place in our company. If you are involved in any part of the recruitment process, make sure that all your decisions are based only on relevant factors such as an individual's performance, skills or qualifications.

**This includes decisions made in the following contexts:**

- › Interviews and recruitment;
- › Promotion;
- › Compensation;
- › Training;
- › Disciplinary action or dismissal.

Help us to ensure that all decisions we make about recruitment, evaluations, promotions, disciplinary action and dismissals are fair and respectful. If you suspect that any kind of discrimination has influenced a decision, tell your line manager or Human Resources department representative about your concerns. Speaking up about discrimination helps us make sure that everyone has an equal opportunity to succeed.



## A.3 Equity and respect

**Respect each other. Our working environment must always be safe and welcoming. We each have an impact, positive or negative, on our working environment.** Check your own behaviour and make sure that it is positive and that you treat all your colleagues, customers, business partners and anyone else you work with, fairly and with respect.

Prevent harassment. Any behaviour that disrupts someone's work or creates a hostile or offensive work environment because of their gender, race,

religion, sexual orientation, gender identity and/or expression, national origin, age, disability, pregnancy, marital status, or any other legally protected status, is a violation of our Ethics Charter and has no place in our company. Such behaviour can take many forms and be verbal, physical or visual in nature. The term "harassment" includes any aggressive or intimidating behaviour, mockery, physical or emotional violence, racial slurs, ethnic jokes or transmission of offensive messages or images.



### Share your concerns

Ignoring harassment or discriminatory behaviour is not an option. You must notify us immediately about any such behaviour. Any employees, including managers and directors, who have been victims of harassment or who have reason to suspect that a harassment situation exists, must report this behaviour to their line manager, the Human Resources department, or Entech senior management.

## B. Health and Safety

Entech is committed to providing a safe and secure working environment for our employees and partners. We have implemented a Health, Safety and Environment (HSE) policy that complies with legal requirements, and we expect our employees, subcontractors and suppliers to respect it.

Safety is one of our fundamental values and a foundational commitment of the company and is at the heart of our operations, products, and services. Follow our health and safety procedures. Stay alert and follow our health, security and safety policies and procedures to the letter when you are at work. Never take unnecessary risks, and avoid any behaviour that puts you or others at risk.



Report any risks or accidents. If you, or someone else, are injured, you must tell us immediately. Report all accidents, injuries or potentially dangerous incidents to the QHSE department, your line manager or the Human Resources department, so that we can take appropriate action.

### Things to remember

- › Dangerous situations or unacceptable health states, safety or environmental conditions must not be ignored. Always report such conditions via hazard or incident reporting channels, or to your manager, so that corrective and preventive action can be taken to avoid accidents.
- › You are prohibited from working under the influence of alcohol, illegal drugs, or medication that could interfere with your ability to safely carry out your work or any task.
- › We expect our business partners, suppliers and other contractors to apply the same health and safety standards as we do.
- › Make sure you properly understand the task required and that you are comfortable and qualified to carry it out, and if applicable, that you have all the necessary authorisations.
- › Use the correct tools and protective clothing for each task. Make sure that the people in your immediate vicinity are aware of what you are doing, so that they can also take appropriate precautions as necessary.
- › Make health and safety a priority in your workplace and in your life in general (for example, wear a seatbelt and do not drive while distracted).
- › Suggest ideas or recommendations for improving health and safety in the workplace.
- › Stay up to date with Entech safety recommendations for business travel.
- › Know the emergency procedures for your workplace (exits and evacuation routes).

## C. Confidentiality and Data Privacy



We recognise the importance of protecting personal data and believe that data protection principles strengthen human rights.

We collect, use, store, store, process, transfer and disclose personal data in strict compliance with applicable laws and expect our suppliers and partners to do likewise.

Personal data is any information that can reasonably be linked to a person.

This may include, for example, a person's home or business address, email address, telephone number, photo, date of birth, bank, IP address, government-issued identification information (ID card, passport, etc.) and other similar information about the person.

### Things to remember

- › Personal data must only be used for commercial or legal purposes and only when required.
- › Use the minimum of personal data that you need for your purposes. Do not collect or use unnecessary data.
- › If you transfer personal data, be aware of applicable local regulations governing this. Never transfer personal data between countries without first ensuring that you understand those countries' data protection standards.
- › When collecting and using personal data, make sure you protect it from inadvertent disclosure, for example by leaving data visible in open spaces (offices, cupboards, etc.), on shared workspaces, on printers, or on unsecured sites.
- › Immediately report any security incidents involving personal data or any perceived shortcomings or weaknesses in confidentiality procedures.

# 04.

## GLOSSARY

### MARKET ABUSE

Market abuse is any unlawful behaviour on a financial market (insider trading, unlawful disclosure of privileged information, price manipulation, etc.) which prevents the market from being fully and properly transparent.

### CONFLICTS OF INTEREST

A conflict of interest is a situation in which divergent interests meet or clash. For example, an employee has a conflict of interest if they have to make a decision that pits their personal interests against those of their company. This situation could lead to a lack of impartiality.

### COMPLIANCE

Compliance refers to the system for ensuring that rules are obeyed, whether national laws and regulations or internal standards and codes of conduct. It protects the company from the risk of administrative or legal sanctions for non-compliance, and preserves its reputation.

### CORRUPTION

Corruption is the act of offering, proposing or receiving an advantage in exchange for a service rendered or an action carried out. This offence is punishable by law. France's anti-corruption measures were strengthened under Article 17 of the "Sapin II" law in June 2016.

### PERSONAL DATA

Personal data is any information that can reasonably be linked to a person, by means of which that person could be identified. For example, names, ID numbers, addresses, etc. Since the General Data Protection Regulation (GDPR) was enacted on 25 May 2018, this data is subject to specific protection.

### RIGHT TO REPORT

The right to report confers the right for employees to report, in the strictest confidence, any observations or questions concerning potentially illicit behaviour, or behaviour that contravenes internal company rules. Such a declaration must be impartial and made in good faith. The French law known as "Sapin II" provides additional protection to whistleblowers.

### FRAUD

Fraud refers to a deliberate act or omission with the aim of obtaining a material or non-material benefit, to the detriment of a person or organisation. Fraud is perpetrated by contravening laws, regulations, or internal rules, by infringing the rights of others, or by concealing all or part of a transaction. Fraud may be external or internal.

### INTEGRITY

A moral virtue that demonstrates strict honesty.

### BANKING SECRECY

The legal obligation of strict confidentiality to customers, which a bank and its employees must adhere to. Banking secrecy can be lifted under specific conditions outlined by law.

### SECURITIES

A security is a category of financial instruments (financial securities or financial contracts), which may be either a title deed (share) or a debt security (bond), and which confers standardised rights (the right to the same coupon or dividend, etc., for a given issuance with the same nominal amount).



## ENTECH SMART ENERGIES

11 allée Jean-François de la Pérouse

Z.A. Menez Prat

29000 Quimper – France

