

GRAINES VOLTZ GROUP ETHICAL CHARTER*

The Ethical Charter defines the principles and values to which Graines Voltz and all of its subsidiaries (hereinafter “the Group” or “Graines Voltz”) adhere and which must guide all Group employees in the daily practice of their profession.

Integrity, ethics, social responsibility, loyalty, respect for the individual, transparency and the fight against corruption and unfair competition are fundamental values of the Group in the conducting of its business.

This Ethical Charter applies to all Group employees (corporate officers, executives, managers, employees, etc., hereinafter “employees”) and to all persons with whom the Group is associated, such as its customers, suppliers, advisers, auditors, consultants, subcontractors, agents and other intermediaries representing Graines Voltz.

The principles defined in this Charter encourage Graines Voltz to conduct business and perform work in a manner that maintains and strengthens customer and stakeholder confidence.

All employees, whatever their hierarchical level, must apply, within the limits of their duties and responsibilities, the rules set out below, which are part of the loyal and good faith performance of their employment contract or term of corporate office, and ensure that these rules are also applied within their team or by the persons under their responsibility.

Employees who fail to comply with applicable laws or regulations, or with the principles of this Charter, may be subject to disciplinary measures in accordance with internal regulations and/or the provisions of the law.

Article 1: Compliance with legislation

The Group undertakes to comply with the laws and regulations in each country where it operates.

Compliance with the law is an essential value. It is the responsibility of all employees to be fully aware of and comply with applicable laws and regulations and the various policies and guidelines established by the Group in its various areas of activity.

All employees are required to be informed of the provisions in force in the Group concerning their area of responsibility, observe them and, in case of doubt or need, consult the competent departments for further information and advice.

Article 2: Respect for individuals

The management of human resources, the leadership of employees and relations between employees are based on the principles of mutual trust and respect, with the aim of treating everyone with dignity.

The Group intends to apply a fair Human Resources policy that is in compliance with the law. In particular, it prohibits any discrimination.

Any pressure, pursuit or harassment of a moral or sexual nature is prohibited.

All employees have the right to respect for their private life, in particular through the regulations on computer data.

Ensuring and strengthening the safety of employees in the performance of their activities is an ongoing concern.

Article 3: Fair competition

Graines Voltz ensures that the rules of competition are respected so that competition is fair and equitable. No action of the Group shall prevent, restrict or distort competition.

Graines Voltz rejects all unfair competitive and commercial practices, in particular any agreement with competitors or any concerted practice concerning financial conditions or the distribution of services, markets or customers.

All formal agreements, concerted practices and informal discussions having the effect or aim of restricting free or fair competition are prohibited.

Accordingly, financial conditions are set independently, and our competitors and customers are free to make their own decisions.

Article 4: Relations with customers, suppliers and other business partners

Graines Voltz maintains honest and fair relations with all of its stakeholders, and in particular with its customers, suppliers and other business partners, in accordance with the ethical principles listed in the preamble.

Consequently, the Group is obliged to honour its contractual commitments and comply with both the letter and the spirit of its commercial agreements. Employees must ensure that they act with professionalism, integrity and fairness to encourage customers to use the Group's services.

Commercial action, both in France and abroad, shall be carried out in compliance with local regulations, which all employees are required to know. In particular, the Group complies with the specific rules governing private and public procurement, regardless of the country in which it operates.

Graines Voltz endeavours to select its suppliers and service providers on the basis of criteria of quality, performance, cost and suitability to its needs. The Group expects an equivalent commitment from its partners in terms of respect for human rights, fair sales and marketing practices, protection of confidential information and intellectual property, the fight against corruption and, more generally, business ethics.

It is the responsibility of each employee to select partners on an objective basis, without favouritism or discrimination, by applying a rigorous selection process.

It may be necessary to use external business partners (business introducers, subcontractors) to provide services. All employees who use a business partner must ensure that appropriate verifications are performed and that the business partner has undertaken to comply with the requirements of this Charter before entering into a business relationship with them.

The services provided by Graines Voltz comply with established quality, health, safety and environmental standards on its own sites and the sites of its customers.

Article 5: Preventing corruption

Graines Voltz is committed to fighting against corruption, influence peddling, misappropriation of public funds, favouritism or any other breach of probity in the countries in which it operates.

It applies national and international anti-corruption laws in all countries where the Group operates.

To meet the requirements of the French Sapin II law of 9 December 2016, Graines Voltz monitors the actions and behaviour of its employees on a daily basis with regard to, in particular:

- Gifts and invitations,
- Relations with public officials,
- Relations with suppliers and customers,

- Patronage and sponsorship,
- Relations with consultants,
- Facilitation payments.

Article 6: Conflicts of interest

A conflict of interest arises when, for example, an employee is in a position to influence a Group decision that may confer a personal benefit on him or her or on a relative or close associate.

Graines Voltz's business decisions are taken objectively, without any personal considerations.

Any activity or duty of the Group's employees and governance bodies (Steering Committee, Board of Directors, etc.) that runs counter to the interests of Graines Voltz is forbidden by the Group.

Numerous situations may give rise to this type of conflict, in particular when an employee or someone close to him or her has a direct or indirect interest in a competitor, supplier or customer of Graines Voltz. Ancillary activities on behalf of a competitor's, customer's, partner's or supplier's companies, as well as financial holdings in such companies, must be communicated to a hierarchical superior, who shall inform the Ethics Officer. Such activities are permitted only with the express written authorisation of the Management. Financial contributions from close family members must be reported to the Management. The same shall apply if a close family member is an employee of a competing company or of a customer or supplier.

Graines Voltz employees must identify the risks of conflict of interest, disclose them to their hierarchical superior and act, in all circumstances, in the best interests of the Group. In the interests of integrity, they should also refrain from any action that could lead to a real or potential conflict of interest. No position within Graines Voltz may be used for direct or indirect personal gain. When faced with a conflict of interest, an employee shall not take part in the decision in question.

Article 7: Insider trading

Any non-public information of a financial, strategic, technical, legal, organisational or governance nature that could influence the Graines Voltz share price (insider information) must remain confidential until it is published by authorised persons in compliance with the applicable stock market regulations. All employees with access to this type of information (permanent or occasional insider) must keep it confidential and refrain from carrying out any transactions in the shares either on their behalf or on behalf of others for as long as such information has not been made public. Using this information for direct or indirect personal gain is not only contrary to the Group's rules of conduct but also to the law and in particular to the AMF regulations.

The persons affected by this article are the members of the Board of Directors and the Steering Committee, by virtue of their status (permanent insiders) and, where applicable, on a case-by-case basis depending on the operations, certain employees of the Group, lawyers or partners (occasional insiders). The Group shall register permanent or occasional insiders on a list after informing them of the rules applicable to the possession, communication and use of insider information and of the penalties incurred in the event of violation of these rules.

Article 8: Confidentiality

Graines Voltz endeavours to ensure that, within the Group and in the performance of its contracts, confidentiality is respected in the use of data, information, know-how, intellectual and industrial property rights and business secrets, in connection with its activities. All employees are required to keep confidential information about Graines Voltz and its customers, suppliers and employees. This obligation continues even after their departure from the Group.

All confidential information must be kept and remain confidential unless it has been disseminated in an authorised and public manner, as its unauthorised disclosure could be prejudicial to Graines Voltz.

All employees must ensure that any information that is not public remains strictly confidential. This obligation of confidentiality does not only cover information relating to Graines Voltz.

All employees shall:

- Limit the disclosure of confidential information to those persons with a legitimate need to know;
- Keep secure, regardless of their format (paper or electronic), all confidential data relating to the activities of Graines Voltz and the companies with which it has business relations;
- Prevent any disclosure of confidential information to persons outside Graines Voltz (including their family members).

Article 9: Accuracy of accounting and financial information

Graines Voltz undertakes to provide accurate, transparent and regular information. The accuracy of the financial statements enables the Group to base its decisions on complete, accurate and reliable information.

Graines Voltz and its employees are obliged to produce regular and accurate financial statements that give a true and fair view of the financial position, results of operations, transactions, assets and liabilities of the Group. The preparation of these documents must be in accordance with accounting principles with entries supported by appropriate documents issued by good faith parties.

All documents shall be kept in accordance with applicable laws and Group policies.

Any transfer of funds requires particular vigilance, especially as regards the identity of the recipient and the reason for the transfer.

The dissemination of financial information and the transactions that employees make on the stock markets, whether they are transactions carried out because of their duties or personal transactions in Graines Voltz listed securities, must comply with the laws and regulations governing financial activities.

Article 10: Use of Group IT resources

The Group's employees shall comply with the Charter for the Use of IT and Telecommunication Resources and the IT Security Policy in force within the Group.

Information technology, namely hardware, software, networks and the information contained therein, is a key factor in the success of Graines Voltz and must be used responsibly and only for legitimate purposes.

E-mails should be drafted with the same care as any other written communication. In particular, employees are prohibited from using Graines Voltz's computer systems to consult, save or send Internet pages or messages with illicit or defamatory content.

Personal use of the Group's IT resources, such as sending e-mails to third parties, must be kept to a minimum and never involve the installation of hardware or software that does not comply with Graines Voltz IT standards or infringes the copyright of third parties.

Article 11: Protection of Group assets

Graines Voltz expects its employees to manage the Group's assets responsibly and make business decisions on the basis of transparent risk-benefit analyses.

Assets include patents, trademarks, know-how, lists of customers, subcontractors or suppliers, information on markets, technical or commercial practices, commercial offers and technical studies and, more generally, all data or information to which employees have access in the performance of their duties.

The integrity of Graines Voltz's commercial partners, among others, must therefore be verified according to the rules and practices in this area.

Employees are not authorised to use Group assets for personal, illegal or unlawful purposes. This does not include items made available to them in the course of their duties or benefits in kind granted in accordance with the regulations in force.

Similarly, the name of Graines Voltz may not be used by employees for personal purposes, particularly on social networks or the Internet. Employees may under no circumstances speak in the name and on behalf of Graines Voltz if they have not been expressly authorised to do so by the Management.

Article 12: Health and safety at work - Anti-discrimination and harassment - Disability

Graines Voltz guarantees adequate health, safety and other working conditions for its employees, who have a duty to contribute to these conditions by complying with the Group's rules in this area.

The Group guarantees its employees and stakeholders a working environment that excludes any discrimination on the basis of gender, sexual orientation, ethnic origin or religion, the status of employee representative, the exercise of a trade union mandate, political opinions, disability, age and any other offensive physical, verbal or visual behaviour. Any form of harassment is prohibited and penalised in accordance with the national legislation in force.

Graines Voltz endeavours to treat all of its employees with respect and fairness and promote equal opportunities in all aspects of employment.

All employees must therefore respect the safety, rights and opinions of their colleagues as well as their cultural or specific characteristics.

Furthermore, Graines Voltz expects its managers to respect gender equality at work.

Graines Voltz does not use any form of forced labour. In accordance with international conventions, it prohibits child labour.

Graines Voltz offers its employees training opportunities that are specially adapted to their field of activity and requirements.

Graines Voltz respects the privacy of its employees and protects their personal data.

The Group has an active policy on disability, in particular through encouragement of employment and integration of disabled employees and support of people in the event that they become disabled during their working lives.

Article 13: Environmental protection - Social responsibility

The Group undertakes to preserve natural and energy resources, reduce the production of waste and harmful emissions into the air and water, and combat climate change. This necessarily implies compliance with the laws in force respecting environmental protection.

Graines Voltz defines environmental actions and objectives in the Statement of Non-Financial Performance.

Article 14: Communication with third parties: media, social networks, investors, analysts & authorities

All communication with such external parties must be accurate and comply with regulatory and legal obligations, in particular the obligations to which Graines Voltz is subject as a listed company.

To ensure consistency, truthfulness of communications and compliance with legal requirements, only employees specifically authorised by senior management may make statements and respond to requests for information from the media, investors, analysts, regulators and other authorities. These same persons are the only ones entitled to delegate this authorisation.

Employees are strictly forbidden to create pages or accounts in the name of the Group on the Internet, use the Group's logos and speak in the name and on behalf of the Group without having been expressly authorised to do so by Management.

Article 15: Implementation

All Graines Voltz employees are required to behave in accordance with this Ethical Charter.

In this regard, managers are given the special role of setting an example. As contact persons, they answer all questions concerning the principles of conduct and ensure that employees are sufficiently informed about the values of Graines Voltz, particularly in their area of responsibility.

All employees may contact their human resources department for any questions relating to this Charter.

It is the responsibility of all employees to inform their hierarchical superior immediately of any legal infringement or breach of the rules of Graines Voltz of which they are aware. Such communications must be in good faith and properly documented. All reports of suspected violations will be treated with the utmost seriousness and confidentiality, in accordance with the reporting procedure described below. The authors of such communications shall not be subject to any retaliation or threat, nor to any harassment, and their identity shall be kept secret to the extent permitted by law.

Article 16: Whistleblowing procedure

Graines Voltz encourages its employees to express their views, defend their opinions and report unacceptable behaviour or requests.

The normal way to raise such concerns is through direct or indirect hierarchical superiors.

Nevertheless, all employees who believe that informing a hierarchical superior may present difficulties or not be followed up on appropriately may refer the matter to the Group Ethics Officer, a position held by the Secretary of the Economic and Social Council.

This procedure is also open to external and occasional employees of the Group.

The Ethics Officer (*Référent Ethique*) can be contacted by e-mail at ethique@Grainevoltz.com or by post at the following address: Graines Voltz, Référent Éthique, 1 rue Edouard Branly - 68000 Colmar (France).

In this context, the author of the report must provide the facts, information or documents, whatever their form or medium, to support the report.

The author of the report shall also communicate his or her contact details (telephone, e-mail, etc.) so that, if necessary, a discussion can take place with the Ethics Officer.

Within five working days, the Ethics Officer shall inform the author of the report of the receipt of his or her request and shall inform him or her of the foreseeable time required for review as well as the terms according to which he or she will be informed of the follow-up on his or her report.

During verifications, the principles of confidentiality and presumption of innocence will be respected. The identity of the perpetrator, the facts and the persons concerned by the report shall be kept strictly confidential. Any investigation shall also be conducted in accordance with the law.

During the course of this investigation, everyone shall be required to cooperate fully and provide, on request, all information and documents.

Any persons accused shall be informed of the nature of the allegations against them but shall not be informed of the identity of the author of the report. Such persons may not be informed immediately if it is necessary, for example, to verify the facts, preserve evidence or refer the matter to the competent authorities.

Any information provided shall only be shared with those who need to know to ensure that the report is being processed and/or that appropriate action is taken. Such persons shall be bound by an obligation of confidentiality.

Subsequently, the author of the report, as well as the persons affected by it, shall be informed in writing of the closure of the verifications and the admissibility of the report.

It is advisable to refer to the Internal Rules, which describe the whistleblowing procedure and its implementation in more detail.

It should be noted that the entire whistleblowing procedure is optional. No penalties or consequences will be taken against an employee who does not make use of it.

Nevertheless, this procedure must be used in good faith and for the sole purpose for which it is intended. Any non-compliant use may be penalised by the Group and result in legal proceedings.

Article 17: Penalties

The various principles of this Ethical Charter are binding insofar as failure to comply with them may result in disciplinary sanctions as provided for in the internal regulations of the Group's various subsidiaries, which may go as far as the termination of the employment contract, in accordance with local legislation and applicable collective agreements, independently of any civil and criminal proceedings that may be instituted with respect to the infringements observed. Guidelines with detailed instructions may be developed if necessary.

Article 18: Entry into force and amendment of the Ethical Charter

This Ethical Charter is an addition to the internal regulations of the Group's subsidiaries and is therefore binding on the Group's employees. It is subject to change to adapt to regulatory and other changes.

In accordance with the provisions of Articles L. 1321-4 and R. 1321-1 et seq. of the French Employment Code, this document has been submitted for the approval of the competent staff representative bodies, sent to the Labour Inspectorate, filed with the clerk's office of the industrial tribunal and made known to any person who has access to the workplaces or premises where hiring takes place.

It shall enter into force on 3 July 2021.

The procedure described above applies only to French companies and shall be adapted to the local regulations applicable to each foreign subsidiary of the Group.

Colmar,
3 June 2021

You are reminded that as an employee of the Graines Voltz Group, you are required to respect the rules in force in the Group.

We invite you to comply with the provisions set out in the Ethical Charter.

You hereby declare that you have read this Ethical Charter and undertake to comply with the rules set out therein.

Company:

Name of employee:

Date:

Signature:

Note: Please return this memorandum signed and dated to the Human Resources Department