



Code of Conduct

CONNECTING
SUSTAINABLE
ENERGIES



CONTENTS

I.	A note from the CEO	4
II.	Introduction :.....	5
	Affirming our purpose and values	5
2.1.	Objectives of the charter: to guide our actions and unite our commitments.....	5
2.2	Commitments: affirming our principles and acting responsibly	6
III.	Governance pillar:	7
	Acting with integrity and exemplarity in our business.....	7
3.1.	Preventing corruption and promoting compliance.....	7
3.2.	Protecting and enhancing our intellectual property	8
3.3.	Driving responsible and committed purchasing	9
IV.	Innovating to accelerate useful and sustainable progress	10
4.1.	Innovating in management to unleash collective intelligence.....	10
V.	Social pillar:	12
	Creating inclusive and respectful working conditions.....	12
5.1.	Defending human rights and promoting social dialogue.....	12
5.2.	Protecting health and safety at work.....	14
5.3.	Promoting equality and diversity as levers for collective progress.....	14
5.4.	Developing skills throughout life	15
5.5.	Ensuring dignified and fair remuneration for all	15
5.6.	Cultivating well-being, fulfillment and meaning at work.....	16
5.7.	Engage locally alongside associations for a concrete impact	16
VI.	Environment pillar:	18
	Reducing our environmental impact and protecting resources.....	18
6.1.	Optimising our energy consumption and limiting our emissions	18
6.2.	Preventing and reducing all forms of pollution.....	19

6.3.	Recycling, recycling and better managing our waste.....	19
6.4.	Significantly reduce our carbon footprint.....	20
VII.	From our internal commitments to our relations with the world	21
7.1.	Promote clear, sincere and respectful communication.....	21
7.2.	Protecting privacy and ensuring data cybersecurity.....	21
VIII.	Implementation and monitoring	23
8.1.	Monitoring and governance system	23
8.2.	Whistleblowing system.....	23
8.3.	Responsibilities of each.....	23
8.4.	Sanctions and Disciplinary Measures.....	24

I. A NOTE FROM THE CEO

At ThermoTechnologies, we have always believed that an industrial company is not only defined by what it produces, but also by how it produces it and the impact it generates.

This ethical charter reflects this commitment. It sets a clear course, based on our values and on principles that guide our decisions and our daily behaviour. She reminds us that our ambition is twofold: to excel in our businesses and to contribute to a sustainable future, while respecting people, the environment and the rules that govern our activity.

For us, innovation is an essential lever for this useful progress. Whether technological, organizational or managerial, it allows us to take concrete action, to meet the challenges of cutting-edge industries and to create solutions that combine performance and responsibility.

I am fully committed to bringing these principles to life and to driving a virtuous circle with you to make ThermoTechnologies a group that counts, not only for what it creates, but for what it brings to the world.

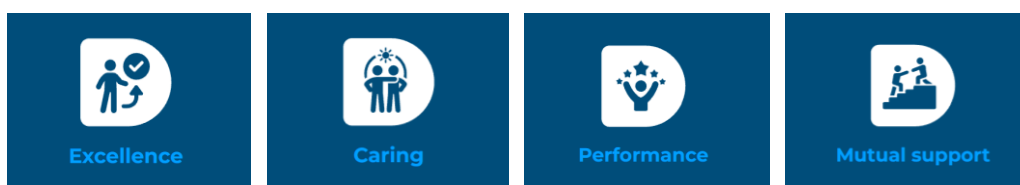
Gilles Mollard
CEO of ThermoTechnologies Group

II. INTRODUCTION :

AFFIRMING OUR PURPOSE AND VALUES

Metal is at the heart of our history and expertise. We explore, transform and sublimate it to meet the challenges of high-tech industries. Every day, we face these challenges with passion, pushing the boundaries of innovation and developing tailor-made solutions. Together, we connect our energies to build a sustainable future, reconciling performance, technicality and responsibility.

Our values are also expressed in our commitment to our people and our communities. We cultivate a quality of life at work where everyone can flourish, grow and contribute fully. Inclusivity, equal opportunity, safety and respect are at the heart of our approach. We believe that a successful company is above all a human and responsible company.



2.1. Objectives of the charter: to guide our actions and unite our commitments

This ethical charter formalizes the framework within which ThermoTechnologies conducts its activities, reconciling industrial performance, integrity and responsibility.

Its objectives are:

- affirm our course by setting out a clear vision and values, shared by the entire Group
- to give meaning to our commitments, by linking them to concrete and measurable actions.
- to unite our teams around a common ambition, by encouraging coherence and transversality.

Built around three pillars (governance, social and environment) and driven by a cross-cutting lever, innovation, this charter reflects our desire to move from intentions to actions, from our internal commitments to an openness to our partners, our territories and society.

2.2 Commitments: affirming our principles and acting responsibly

At ThermoTechnologies, we are proud not only of what we produce, but of how we do it and the impact we leave on society and the environment, in compliance with the rules that govern our activities.

Our commitments are based on:

- Integrity and transparent governance, guaranteeing the vision and respect of our values
- A strong social ambition, focused on security, fulfilment and the development of talent
- a strong environmental responsibility, with concrete objectives to reduce our footprint and contribute to the energy transition
- Continuous innovation, a driver of our competitiveness and a useful lever for progress for our customers and our ecosystems

III. GOVERNANCE PILLAR:

ACTING WITH INTEGRITY AND EXEMPLARITY IN OUR BUSINESS

Compliance with laws, regulations and ethical principles is the very basis of our corporate responsibility. Being a responsible industrial player means acting with complete transparency, with integrity, and in strict compliance with the legal frameworks that govern our activities, in all the countries where we carry them out.

This requirement is not only a regulatory obligation: it reflects our commitment to ethical governance, based on trust, loyalty and exemplarity. Every employee, regardless of their role, is required to know and apply these rules, in order to guarantee impeccable practices in all our interactions with our customers, partners, suppliers, and institutions.

We ensure that our decisions and behaviours are guided by these principles, as they are the foundation of our credibility and sustainability. Respecting ethics means preserving our collective integrity. Respecting laws and regulations means affirming our desire to contribute to sustainable and responsible industrial development.

3.1. Preventing corruption and promoting compliance

Compliance refers to all the rules, procedures and practices that make it possible to comply with the law and to prevent any ethical, legal or reputational risk.

At ThermoTechnologies, compliance goes beyond a regulatory obligation: it is our way of reconciling performance and ethics. It is based on respect for the law and on the desire to act with exemplarity in all our activities.

The group has zero tolerance for any form of corruption, fraud, money laundering, conflict of interest or influence peddling. The company is committed to conducting its activities with integrity, transparency and in strict compliance with the laws and regulations in force in the countries in which it operates.

The company guarantees strict confidentiality of the identity of whistleblowers, the persons targeted by the whistleblowing and the information collected by all the recipients of the report.

We expect employees and our stakeholders to:

- That they actively follow the training courses offered on these ethical themes
- That they strictly comply with the internal procedures handed to them
- They should immediately report to their manager, the human resources department or the email address compliance@thermo-technologies.com any internal or external situation that could be assimilated to corruption, fraud, money laundering or influence peddling.
- Proactively report any attempted bribery
- That they proactively declare any conflict of interest and withdraw from the relevant decisions.

3.2. Protecting and enhancing our intellectual property

Intellectual property includes all the legal rights that protect creations, inventions, patents, drawings, software and other intellectual productions, guaranteeing their authors exclusive use.

At ThermoTechnologies, intellectual property is not just a legal framework: it is a strategic lever to stimulate innovation and preserve our competitiveness in a constantly evolving market.

We are firmly committed to respecting and ensuring that these rights are respected, both for our own development and for those of third parties.

In concrete terms, we protect the results of our Research & Development by filing patents and appropriate titles. We make sure that we only use external resources for which we have the necessary rights or licenses. We scrupulously respect the intellectual property rights of other players, particularly in our monitoring and innovation activities.

Through a proactive approach, we affirm our desire to reconcile innovation and ethics, and to guarantee fair practices in the context of increased competition. Any failure to comply may result in legal and regulatory sanctions, civil, criminal or administrative, in France and internationally.

3.3. Driving responsible and committed purchasing

More than just transactions, purchasing at ThermoTechnologies reflects our desire to contribute to a more responsible and sustainable value chain.

We are committed to requiring our suppliers to respect fundamental human rights and ensure that our teams also adopt exemplary ethical conduct, which is an essential condition for human and commercial relations based on trust and transparency.

Each supplier must strictly comply with the contractual clauses and specifications defined by ThermoTechnologies. In the event of a recurring breach or non-compliance, claims or proceedings may be initiated. And if a serious violation is found (for example, the use of child labour), the immediate and definitive termination of the business relationship may be applied.

IV. INNOVATING TO ACCELERATE USEFUL AND SUSTAINABLE PROGRESS

At ThermoTechnologies, innovation is everywhere: in our products, our processes, our management. This approach makes innovation a differentiating marker: it pushes us to anticipate, adapt and dare, by mobilizing creativity and the right to try. This is how we transform ideas into concrete, useful and sustainable solutions, at the service of our customers, our teams and society.

Supported by management principles that put the right to trial at the heart of their practices, each employee is called upon to innovate to transform their daily lives every day, to propose and implement solutions, and to support our customers in the development of innovative technologies. Each manager is called upon to create the conditions for this right to try out to be fully expressed.

A true link in a virtuous circle, innovation is part of our DNA and is an essential vector of development.

4.1. Innovating in management to unleash collective intelligence

Because innovation permeates all our activities, it also inspires our way of managing. It is not just a question of coordinating or deciding, but of inventing new ways of working together and mobilizing women and men around a vision. Management is at the heart of ThermoTechnologies' human dynamics and is an essential lever for meaning, performance and cohesion.

Innovating in our managerial practices means encouraging a network that promotes the circulation of information, the sharing of knowledge and collective intelligence. It also means cultivating permanent agility, capable of adapting to changes, being reactive and involving teams in both reflection and action.

Managers are there to open up the field of possibilities, create the conditions for individual and collective success and help talent grow. ThermoTechnologies trains and supports them so that they:

- **inspire and embody our values** of high standards, performance, benevolence and mutual aid, set an example and are fair in their decisions
- **give meaning**, by linking individual missions to collective objectives and the overall strategy
- **act** with confidence, clarity and listening,
- **promote cooperation**, by encouraging experimentation, mutual aid, transversality and initiatives
- **establish a climate of trust**, daring to say things with courage, where everyone can express themselves, propose, learn and progress
- **Carry collective performance**, by setting clear, ambitious and achievable objectives, and by ensuring constructive and regular monitoring.

Being a manager at ThermoTechnologies means inventing a more human, agile and responsible management, at the service of the collective and bearer of vision.

V. SOCIAL PILLAR:

CREATING INCLUSIVE AND RESPECTFUL WORKING CONDITIONS

The vision:

We want to **be a learning, inclusive and attractive company**, where each employee embodies our values of high standards, performance, benevolence and mutual aid, finds meaning, progresses and actively contributes to our growth dynamic.

5.1. Defending human rights and promoting social dialogue

Guaranteeing freedom of association and the right to collective bargaining

At ThermoTechnologies, we consider freedom of association to be a fundamental right, enshrined in the Declaration of the Rights of Man and of the Citizen of 1789, guaranteeing everyone the freedom to assemble and organize to defend common interests.

We fully recognise the essential role of employee representative bodies, which are strategic partners in social dialogue, and see this dialogue as a lever for progress and cohesion for the entire company.

Because we believe that the collective expression of employees enriches our reflections and contributes to improving our working conditions and our organization, we guarantee the possibility of expressing oneself freely. No discriminatory measure, direct or indirect, will be tolerated against an employee because of his or her union involvement. Any hindrance to the exercise of this right is contrary to our values and exposes to legal sanctions.

Firmly prohibit forced labour and child labour

According to international standards, forced labour refers to any work or service that is required of a person under the threat of punishment or coercion.

At ThermoTechnologies, we strongly and uncompromisingly reaffirm our opposition to any form of forced labor or child labor. For us, respect for human rights is non-negotiable: it is the essential foundation for ethical, responsible and sustainable business, both at our own sites and throughout our supply chain.

In the event of a breach, we conduct a confidential, impartial and documented investigation and take the necessary sanctions, whether it is a supplier or an internal entity. Because taking action against forced labour and child labour means defending the dignity and fundamental rights of everyone, at the very heart of our corporate responsibility

Preserving work-life balance with the right to disconnect

The right to disconnect is a mechanism for regulating the use of digital tools, with a view to ensuring respect for rest and leaving times as well as personal and family life.

At ThermoTechnologies, we consider the right to disconnect as an essential principle to preserve the balance between professional and personal life.

In concrete terms, no employee should feel obliged to respond to a professional request outside of their usual working or on-call hours, except in an emergency situation likely to interrupt the continuity of service or production or presenting a serious and imminent danger. When they are absent, employees can inform them of their unavailability and direct their contacts to a relay in case of emergency, while managers make sure to organize and anticipate these absences to ensure business continuity.

This principle is based on a shared responsibility: everyone is responsible for organising and passing on the necessary information before an absence, and managers are responsible for coordinating and distributing tasks.

Finally, we clearly state that no employee can be sanctioned for not having responded outside his or her usual working hours or on-call duty. If difficulties arise, a reminder of good practices will be made to the manager and/or employee.

5.2. Protecting health and safety at work

Health and safety cannot be decreed: they are built every day, together.

At ThermoTechnologies, we consider occupational health and safety to be a fundamental right and an essential pillar of our sustainable and responsible performance. Protecting the physical and mental integrity of our employees, as well as that of our stakeholders, is a strategic priority.

We are committed to maintaining a true safety culture within each of our entities. This is built and strengthened through regular awareness-raising, training and information programs, designed to support managers in their key role of leadership and prevention, and to empower and strengthen the involvement of each employee in these areas.

We expect our employees and visitors to:

- that they comply with safety instructions and in particular the systematic wearing of personal protective equipment (PPE)
- report any dangerous or near-miss situation
- that they actively contribute to the continuous improvement of safe working conditions

5.3. Promoting equality and diversity as levers for collective progress

We want to create an environment where everyone feels respected, valued, and heard, where differences are celebrated, and where every individual has the opportunity to contribute fully to our collective success. We believe that diversity is a source of richness and innovation.

As such, each employee is called upon to:

- To behave respectfully **in all circumstances**, excluding any words, attitudes or jokes that could undermine a person's dignity.
- **Report without delay** to a manager, HR or via internal systems any situation of harassment, discrimination or inappropriate comments that they witness or suffer.
- Cooperate in good faith with the investigation or mediation procedures put in place by the company

We expect everyone to:

- that it contributes to creating a working climate based on **cooperation and solidarity**, taking into account specific needs where necessary.
- Adopt an **open and non-stereotypical** attitude, recognizing the value of each person's skills, regardless of age.
- that it contributes to an inclusive working environment, ensuring respectful use of language and the absence of sexist behaviour.
- that he adopts a **caring and inclusive** attitude, by facilitating the integration of people with disabilities within the team.

5.4. Developing skills throughout life

In a context where the organization and each of its members must continually adapt to change and move forward in uncertainty, skills development and continuous learning becomes a strategic issue for the company.

Effective team management is inseparable from an investment in quality learning and skills development. When individuals are encouraged to develop, the whole team develops. We believe that a strong team is one that continuously learns, innovates, and supports each other to achieve common goals in a sustainable and ethical way.

Our employees are invited to

- Share their knowledge and know-how with their colleagues
- Be curious, and implement best practices
- Actively participate in and contribute to learning situations (training, feedback, sharing of practices, etc.)

5.5. Ensuring dignified and fair remuneration for all

At ThermoTechnologies, we consider compensation to be an essential lever for recognition, motivation and respect for the dignity of each employee, beyond the salary alone.

In accordance with the definition of the International Labour Organization, we affirm our commitment to an income that covers essential needs (housing, food, health, education), but also includes access to leisure, culture and savings.

To this end, we are committed to:

- Regularly compare remuneration to the market and correct unjustified discrepancies.

- Ensuring internal consistency of compensation
- Make the criteria for awarding bonuses and benefits legible.

We value results, of course, but also the efforts made to achieve them. Recognition is not limited to performance in figures, it extends to behaviours that we expect to reflect our values: respect for the rules, commitment, quality of work, rigour, adaptability, team spirit, sharing of knowledge and know-how, mutual aid and cooperation, respectful relationships with others, willingness to learn and innovate.

5.6. Cultivating well-being, fulfillment and meaning at work

At ThermoTechnologies, we place well-being at work at the heart of our social and human approach. We know that a respectful, safe and stimulating environment promotes both collective performance and the development of employees. Our commitment is part of a logic of continuous improvement, nourished by listening to the needs and feedback of our teams.

We expect our employees to:

- that they actively contribute to the maintenance of a work environment that respects everyone by respecting the rules of living together and the values of the company.
- that they report any risk situation to their manager or the Human Resources departments
- that they participate in internal staff satisfaction surveys.

5.7. Engage locally alongside associations for a concrete impact

Associative commitment refers to the voluntary participation of our employees in actions of general interest carried out by associations, whether it is sponsorship, mobilization of skills or working time dedicated to social, environmental or cultural causes.

The ThermoTechnologies Group is actively involved in many community projects, through sponsorship and volunteerism. This commitment reflects our desire to go beyond our economic activities to create a concrete and sustainable impact, in the service of the common good and sustainable development. Through these initiatives, we forge direct links between the company and society, while giving our teams the opportunity to get involved in causes that make sense.

In order to enhance the commitment of our employees, we invite them to seek the support of the company in their voluntary and solidarity commitments.

VI. ENVIRONMENT PILLAR:

REDUCING OUR ENVIRONMENTAL IMPACT AND PROTECTING RESOURCES

At ThermoTechnologies, combining industrial excellence and respect for the planet is at the heart of our environmental commitment. We are changing our practices to reduce the impact of our activities, preserve natural resources and support the transition to a low-carbon and circular economy. This involves optimising our energy and water consumption, preventing and reducing pollution, recovering and recycling materials, and significantly reducing our carbon footprint. Each of our actions is based on a clear ambition: to prove that innovation, industrial performance and respect for the environment can move forward together, in the service of a sustainable future for all.

6.1. Optimising our energy consumption and limiting our emissions

At ThermoTechnologies, we make controlling our consumption of natural resources, particularly water and energy, an essential pillar of our environmental commitment. Reducing our footprint sustainably means acting both to preserve natural resources and to make our activities part of a process of responsibility and shared progress.

Our ambition is clear: to combine energy sobriety, responsible resource management and compliance with current regulations, such as the Energy and Climate Act and the European Energy Efficiency Directive.

We optimise our consumption thanks to monitoring and alert systems that prevent any drift and reinforce continuous improvement. This commitment is also reflected in particular vigilance on our discharges, with specific treatment devices to limit the impact on natural environments, particularly in terms of nickel.

Each employee is called upon to

- Ensuring the preservation of natural resources by limiting water consumption

- Alert if he/she notices a drift
- Optimising our consumption and limiting our emissions by participating in our continuous improvement initiatives

6.2. Preventing and reducing all forms of pollution

Preventing and reducing all forms of pollution is an integral part of ThermoTechnologies' approach to limiting its environmental footprint. This commitment is reflected in concrete actions in favour of air, water and soil quality.

We scrupulously comply with the legal and regulatory requirements in force, while going beyond them if possible, in order to better protect ecosystems and the health of populations.

Reducing our environmental impact also means strengthening our performance and our collective responsibility, combined with respect for territories and the preservation of natural resources. It is this conviction that guides each of our actions towards a responsible industry, respectful of the planet and concerned about future generations.

Each employee is called upon to

- Respect procedures, standards, and good production practices and alert in case of drift
- Control and process discharges in accordance with thresholds, with traceability of results.
- Optimising our consumption and limiting our emissions by participating in our continuous improvement initiatives

6.3. Recycling, recycling and better managing our waste

ThermoTechnologies is committed to a circular economy by structuring a structured policy for the recycling and recovery of metals. This commitment is in line with the Environmental Code, the Waste Framework Directive 2008/98/EC and the European Critical Raw Materials Regulation. Each metal flow resulting from our activities is rigorously traced, sorted at source, and then entrusted to approved treatment channels.

We are committed and invite our stakeholders:

- Sort waste at the source and trace its flow to the end of its treatment.
- Reduce waste by design (recyclability, recycled content).
- Train teams in the rules for managing hazardous or non-hazardous waste.

6.4. Significantly reduce our carbon footprint

The carbon footprint corresponds to the quantity of greenhouse gases emitted into the atmosphere by an activity, whether human or industrial. Reducing our emissions is a priority, in line with the objectives of the Paris Agreement, which aim to limit global warming to 2°C compared to the pre-industrial era.

We promote the circular economy by reinjecting our material waste into our mother yarn manufacturing process. We use recycled materials to limit our environmental footprint. We give used reels a second life by reintegrating them into our supply chain.

In addition, we prioritize working with partners who share our climate commitment and use recycled materials. To do this, we assess our stakeholders on the basis of carbon criteria, in order to identify the most responsible players and strengthen our cooperation with them.

We are committed and invite our stakeholders to:

- Measure emissions (relevant scopes) and follow reduction plans with milestones.
- Reuse and recycle materials and packaging where possible.
- Evaluate partners on carbon criteria and favor the most responsible.

VII. FROM OUR INTERNAL COMMITMENTS TO OUR RELATIONS WITH THE WORLD

7.1. Promote clear, sincere and respectful communication

Our public communications are much more than messages: whether they come from us as a company or are relayed by a collaborator, a partner or any other stakeholder, they have the power to influence the perception of ThermoTechnologies.

Each of us has a responsibility to protect sensitive information and to remain discreet when speaking publicly about the company, including in informal or private contexts. No confidential or strategic information should be shared, as it could harm our competitiveness, reputation or the safety of our teams.

If one of our employees is asked by a journalist, a media outlet or any other external party to obtain information, he or she must immediately forward the request to the communication department, which is the only one authorized to respond officially. Similarly, any content intended for external distribution, whether promotional, commercial or informative, must be validated beforehand by this service.

Compliance with these principles is essential to the long-term protection of our image and credibility. Violating them, especially by disclosing false, confidential or sensitive data, can have serious consequences, up to and including disciplinary action. This vigilance is all the more crucial as we operate in strategic sectors where confidentiality and control of information are a major issue of security and trust. Communicating responsibly means protecting our company, its partners and the women and men who make it live.

7.2. Protecting privacy and ensuring data cybersecurity

Cybersecurity for ThermoTechnologies is a major strategic, ethical and societal issue. We implement an information security management system that complies with international

standards, including ISO/IEC 27001, and regulatory requirements, in particular the General Data Protection Regulation (GDPR).

Our employees and stakeholders are key players in the protection of data and privacy. As such, we invite them:

- To strictly apply all the IT security measures communicated to them
- To comply with authentication and access measures
- To report any suspicion of phishing immediately and follow the dedicated procedure.
- To keep the processing register up to date and respond to GDPR requests within the deadlines.

VIII. IMPLEMENTATION AND MONITORING

8.1. Monitoring and governance system

The implementation and compliance with this ethical charter are based on a dedicated governance system:

- An **Ethics Committee** is established. It is composed of the CSR referents and a representative of the General Management and Human Resources and the Compliance Manager.
- The Ethics Committee's missions are:
 - to ensure the **management and monitoring of the application of the charter** ;
 - to **raise awareness and train** employees in ethical principles;
 - to **analyse the reports** received and to propose corrective measures;
 - report **these reports** in the sustainability report.
- This charter may be **revised regularly** (at least every two years) to take into account legal, regulatory and organisational changes.

8.2. Whistleblowing system

An **internal and confidential whistleblowing system** is set up to allow any employee to report an ethical breach, inappropriate behaviour or any situation contrary to the organisation's values. It is detailed in the specific procedure on whistleblowers.

8.3. Responsibilities of each

- **General Management** : guarantee the necessary resources for the implementation of the charter and embody ethical values.
- **Supervision / managers** : promote the principles of the charter to their teams and be the first point of contact in the event of ethical questions.
- **Human Resources** : integrate ethical principles into HR processes and contribute to the management of breaches.

- **Employees** : respect the principles of the charter, adopt ethical behaviour and report any shortcomings observed.
- **Ethics Committee** : supervise the application of the charter, analyse alerts and propose appropriate measures.

8.4. Sanctions and Disciplinary Measures

Any proven breach of the ethical principles set out in this charter may give rise to a disciplinary sanction.

- Depending on the seriousness of the facts, the measures can go from:
 - a **call to order** or **written warning**,
 - disciplinary **layoff**,
 - up to dismissal **for serious misconduct**, in accordance with the internal regulations and the provisions of the Labour Code.
- In the event of criminal offences, the facts will be **reported to the competent authorities**.
- Sanctions will always be imposed in accordance with the rights of the defence and in accordance with the **principle of proportionality**.

The adoption and application of this ethical charter is binding on each employee. Respecting them helps to build a culture of accountability, integrity and trust within the organization.