

# Code of conduct



**lisi**

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# Foreword

LISI has founded its growth, both internally and externally, on strong management rigour, industrial excellence, probity in behaviour and compliance with applicable laws and best practices. LISI is committed to applying the Global Compact created by the United Nations as it is aligned with its values. This programme aims to develop companies sustainably by aligning their strategies and operations with ten universal principles (relating to human rights, labour, environment and anti-corruption). This programme also aims to take action to advance societal goals and the implementation of clear, measurable and sustainable development objectives.

LISI has drawn up a code of conduct to inform and guide each employee's behaviour. This code is rooted in LISI's raison d'être, founded on the Group's values and places the Group in its environment. The rules of conduct are built around a 3P approach (People, Planet, Profit) and focus on 7 main areas. These rules are precise, practical and support decision making and the right behaviour to adopt.

LISI attaches the greatest importance to acting in an irreproachable manner with regard to its stakeholders. To back up this commitment, the Group is intensifying its actions guided by the Sapin II French Law framework and is organising periodic internal audits across all its locations.

LISI employees, if you have any doubts about a situation that might potentially pose an ethical problem, you should ask yourself these questions:

- **Is my decision in line with LISI's Values?**
- **Would I feel comfortable telling my manager and/or colleagues what I have done?**
- **Would I be proud if my action, or failure to act, was made public internally and/or externally?**  
If in doubt, advice must be sought from your line manager.

Any violation of this Code, Company policies or applicable laws may seriously damage the integrity and reputation of both our Company and the individual involved.

The mechanism implemented aims to prevent these risks, and we remain at your disposal to answer any questions you may have.

**lisi**

**Geoffroy Kohler**  
Director Internal Audits, Risks and Compliance LISI



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# 1. lisi's PURPOSE

## Shape and share sustainable links

As part of its overarching strategy, the LISI Group intends to materialise its *raison d'être* in order to give **lasting meaning to its actions**. This approach confirms our strong will to share our vision and clearly state what we do every day and why we do it.

Our economic **development and social responsibility** are henceforth closely linked within the core of our purpose.

Our long-term vision has long been governed by anticipating the impacts of our industry and strengthening the links between business development, societal progress and environmental progress. Today, our purpose is an affirmation of our commitment to the United Nations' Sustainable Development Goals. To meet these challenges and durably improve performance, safety and everyone's well-being, LISI relies on the twin action levers of **innovation and operational excellence**. With all these key levers, we are affirming our confidence in the future.

Because it expresses both our identity and our corporate project, our purpose has the value of a truly inspiring and unifying commitment: it inspires our professions, innovations and ambitions. It rallies our ecosystem and our values around our employees. **It guides and informs all our decisions and actions for a better future.**

**Shaping and sharing lasting relationships is our purpose**, and one that has been forged on permanent innovation and industrial excellence serving everyone's performance, safety and well-being, both in our own ecosystem and the world.

Our purpose lies at the core of our corporate culture and development.

• **Inclusive and sustainable**, LISI's purpose is the very essence of our business, the ambition that drives us and the compass that guides our decisions and actions. It is a lasting inspiration to our commitments with regard to the stakeholders who make up our "ecosystem", the first and foremost of which are our employees.

• **Founded on entrepreneurial values**,

it is not a mere slogan and its scope is not limited to a Corporate Social Responsibility (CSR) program.

On one hand, our corporate signature manifests as the desire to encourage - through our identity and purpose - the **durability and value of an ecosystem** whose strength is rooted in the sustainable links that we shape and share with our stakeholders: employees, customers, shareholders, banking partners, suppliers and territories, both in France and internationally.

On the other, it also refers to our identity and our ability to design and deliver reliable and durable assembly solutions; fasteners and complex parts that are ever more efficient and eco-responsible, solutions whose technical prowess and dependability aim to durably satisfy some of today's most exacting industries: aerospace, automotive and medical.



# 2. lisi's Values

## VALUES

On the strength of its values, the LISI Group attaches special importance to the professional and personal development of its personnel, so that all members can express the very best of themselves.

It is LISI's intention to build a solid collective while offering each individual the necessary autonomy and an environment that incites them to look further afield. It is within this meaning that LISI's values are set out below, reflecting its constant quest for innovation and operational excellence, which are key to each of our employees' engagement.

### 1 LOOKING BEYOND. TOGETHER. #SUSTAINABILITY

The LISI Group has always adapted to the changes of its time. Today, we are committed to continuing the work of the generations of women and men who have made LISI a viable and productive international company. Aware of our impact on society and the environment, we prefer to take a long-term view and strive to reduce the environmental footprint at our locations in accordance with our strategic development plan.

### 2 COMMUNICATING TRANSPARENTLY. TOGETHER. #INTEGRITY #TRANSPARENCY

In everything we do, we act with sincerity, good conscience and honesty and in compliance with regulations. We expect exemplary behaviour from our employees and partners. We create transparent, sustainable relationships with our customers and suppliers and regularly publicise our undertakings and our performance.

### 3 CULTIVATING INNOVATION. TOGETHER. #INNOVATION #DIGITAL

We think ahead of the changes and risks associated with our profession to deliver the best solutions to our stakeholders. Technology and creativity nourish innovation. We design environmentally friendly products and services, taking their entire life cycle into account.

### 4 DEVELOPING OUR KNOW-HOW. TOGETHER. #HUMAN #EVOLUTION

The men and women who work at LISI are the primary driving force behind our development. We promote and develop their skills and make it a point of honour to promote the talented women and men who count and who enrich our Group. We safeguard health, safety and well-being. We apply a policy of non-discrimination and diversity at every level of human resources management.

### 5 AIMING ALWAYS HIGHER. TOGETHER. #EXCELLENCE #PRAGMATISM

We do our utmost to deliver competitive quality products and services, which meet the highest standards and excellence expected of us by our interested parties. We continually measure our performance and constantly seek to improve. Our customers' satisfaction is the principal guarantee of our long-term viability. We are individually and collectively committed and involved in the effort to anticipate and exceed the expectations of all stakeholders. Our actions aim to be practical and concrete.



# LISI and the Global Compact

The Global Compact is a United Nations initiative launched in 2000 to encourage socially responsible behaviour by companies around the world.

LISI has decided to adhere to the Global Compact, as it is perfectly in line with its values.

**The Global Compact** is built around **4 themes**, which break down into **10 principles**.

## HUMAN RIGHTS

- Promoting and safeguarding the protection of international human rights law.
- Not being complicit in human rights violations.

## INTERNATIONAL LABOUR STANDARDS

- Compliance with the convention on freedom of association and collective bargaining rights.
- Contributing to the elimination of all forms of forced or compulsory labour.
- Contributing to the effective abolition of child labour.
- Contributing to the elimination of discrimination in employment and occupations.

## ENVIRONMENT

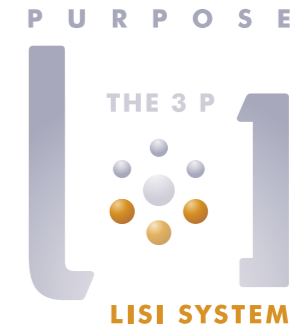
- Applying the precautionary principle to environmental issues.
- Taking initiatives to promote greater environmental accountability.
- Encouraging the development and dissemination of environmentally friendly technologies.

## THE FIGHT AGAINST CORRUPTION

- Fighting corruption in all its forms without exception.

# 3.

## The 3P approach and its 7 areas



As a responsible corporate citizen, LISI takes into account the social, human, economic and environmental dimensions of its business in its relationships with each of its stakeholders. It acts with a permanent concern for progress and the sustainability of its business.

Guided by our *raison d'être* (Shaping and Sharing Sustainable Links) and by our values, LISI's sustainable development strategy is built around a 3P approach:

**This 3P approach is focused on seven action areas:**



# PEOPLE

The women and men of LISI are our most valuable asset. LISI makes every effort to ensure that their skills are promoted and developed, and that their health, safety and well-being are protected. LISI applies a policy of non-discrimination and diversity at every level of human resources management. LISI values mutual respect, realism, commitment and responsibility. LISI promotes individual initiative and encourages diversity of opinion. LISI provides a caring, innovative and stimulating working environment that incites everyone to express their full potential.

## PROTECT OUR EMPLOYEES



### Human rights and labour standards

- never resorts to child labour and has a zero-tolerance policy in this respect. LISI sets the minimum apprenticeship age at 15, and at 18 for employees hired under any other employment contract.
- never uses forced or compulsory labour.
- complies with the applicable legislation in each of the countries in which it operates: these laws recognise and safeguard employees' rights to freedom of association and collective bargaining.
- pays compensation and benefits in accordance with applicable laws.
- also complies with laws governing working hours and overtime.

### Anti-harassment

**lisi** does not tolerate any form of behaviour that encourages or contributes to a hostile work environment. No employee shall be subjected to physical or verbal abuse, intimidation or any other form of unlawful harassment, whether by management, another employee or third parties.

**lisi** prohibits sexual advances and any physical contact considered inappropriate, gestures or comments with a sexual connotation, as well as the display or dissemination of photographs, caricatures, jokes or other documents conveying a sexual connotation.

### Commitment to health and safety

Through its HSE policy, LISI is strongly committed to providing its employees with a safe and healthy workplace. All our employees and subcontractors must be able to perform their day to day work safely and leave their jobs in good health. This commitment is reflected by the fact that our production facilities are ISO 45001-certified.

Every LISI employee must promote health and safety at work and abide by the applicable rules. To achieve the desired level of safety, everyone must be vigilant, cautious and exhibit exemplary behaviour at all times.

The Golden Rules are LISI's basic safety rules, common to all our production facilities. All employees are familiar with them and apply them in an exemplary manner.

### Alcohol and drugs

Working under the influence of drugs or alcohol can constitute a safety hazard and affect our judgment. This is why LISI prohibits its employees from working under the influence of these substances.

### Non-violence

**lisi** is committed to preventing all forms of violence or threats in the workplace. Persons who commit acts of violence or use threats are liable to disciplinary measures including dismissal.

### Ban on weapons

The possession or use of weapons, which may include but are not limited to sharp-edged weapons, firearms and martial arts weapons, whether or not a licence to carry them is held, is prohibited in the workplace. This prohibition does not apply to knives and other sharp objects required, authorised or provided by the company as part of an employee's duties, or intended for use as tools.

With the possible exception of a weapon kept in a locked private vehicle and on the double condition, however, that this is permitted both by law and by the company, it is not permitted to possess a weapon or part of a weapon (e.g. ammunition) on the company's premises (buildings, car parks, driveways and other places owned, leased or occupied by the company).

### Personal data protection

Personal data is considered to be any information relating to an individual that directly or indirectly identifies him or her, including but not limited to a person's name, e-mail address, salary, home address or marital status.

**lisi** recognizes the importance of personal data protection, as governed by the General Data Protection Regulation (GDPR), and undertakes to protect and restrict access to personal data only to those who are authorised and need it to perform their duties. LISI undertakes to regularly review the existence of the needs expressed by this public.

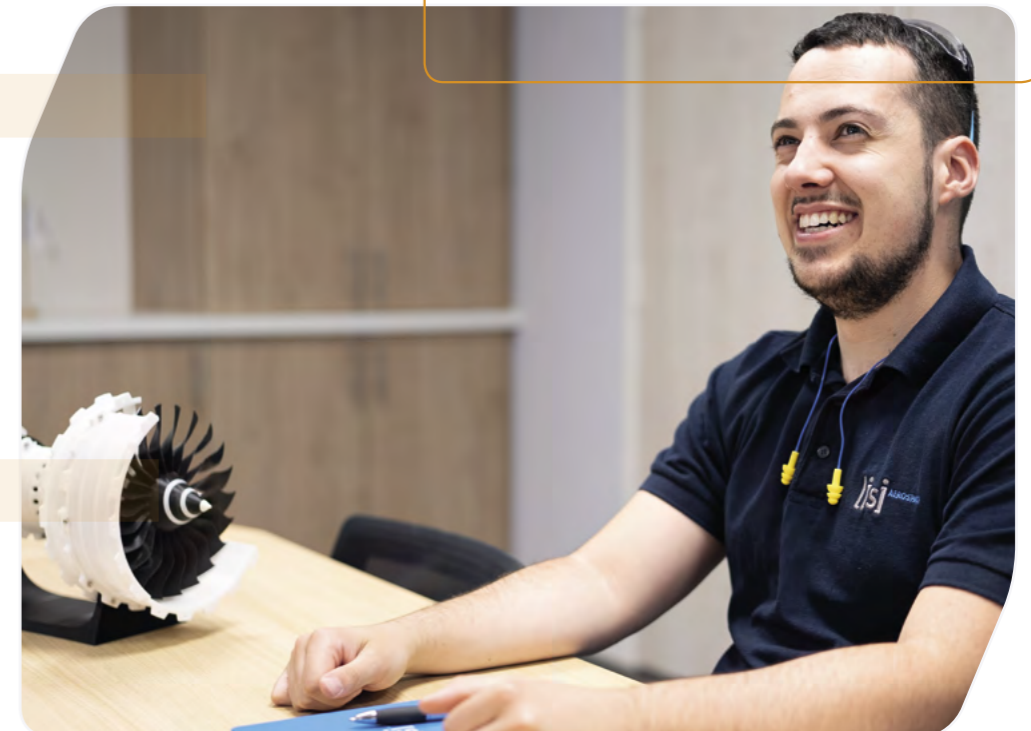
#### THE PERSONAL DATA COLLECTED MUST BE:

- Processed fairly and lawfully;
- Obtained for specified, explicit and legitimate purposes;
- Adequate, relevant and not excessive in relation to the purposes for which it is collected.

Employees have the right to access and rectify their personal data. However, these rights may only be implemented in a reasonable and legitimate manner, and in no case abusively.

For more information on employee rights, please consult the "Personal Data Protection" section or the "Ethics" section of the LISI Group website :

<https://www.lisi-group.com>



## RETAIN OUR TALENTS

### No fees for candidates

**lisi** prohibits the practice of asking candidates to pay a fee for their recruitment. All fees relating to recruitment are settled by the company.

### Mutual respect

**lisi** REQUESTS ITS EMPLOYEES, IN ALL CIRCUMSTANCES, TO:

- Speak respectfully to colleagues and other members of the company's personnel;
- Refrain from using excessive and/or disrespectful language;
- Refrain from adopting an aggressive attitude when faced with a frustrating or unpleasant situation;
- Refrain from saying or doing anything, even in jest, that might offend, intimidate or embarrass others.

**lisi** encourages an open and trusting dialogue with its employees.

### Diversity, integration, non-discrimination

**lisi** fights all forms of discrimination and ensures that all employees, at all levels, are treated equally in terms of recruitment, pay, benefits and career advancement. Its employees make decisions solely on the basis of legitimate criteria, such as an individual's qualifications or skills, and not on the basis of age, gender, religion, ethnic or national origin, pregnancy status, disability, sexual orientation or any other characteristic protected by applicable law.

**lisi** states that no one can refuse to work or collaborate in a team because of the above-mentioned characteristics.

**lisi** respects and values the diversity reflected in the backgrounds of its employees, their experience and their ideas.

**lisi** makes every effort to strengthen employment equality between men and women.

**lisi** collaborates with organisations that support young people with disabilities in their training, as well as with social and professional induction and job retention organisations.

### Cooperation with employee representatives

For LISI, maintaining a relationship of trust and close cooperation with employee representatives is an essential part of corporate responsibility. Reciprocal trust and cooperation are based on open and constructive dialogue, which is characterised by mutual respect.

### Employee consultation and participation

The actions implemented by the LISI Group to involve its employees include informing them about the company's results and projects, and creating opportunities for discussion.

All LISI locations are required to inform and consult their employees, either directly or through appointed or elected representatives, regarding any action or decisions contemplated that may significantly affect their working conditions and the company's future.

Employees or their representatives are provided with the information necessary for their full and effective participation in this consultation.

Consultation means that management not only shares information with employees, but also listens and takes into consideration what they have to say before making decisions.

On sites with employee representative bodies, these are the preferred channels for information and consultation. Sites without employee representative bodies must organise employee information and consultation in an appropriate manner.

Employees and/or their representatives, whatever their status and level of responsibility, must have the opportunity not only to express their opinions, but also to participate in health and safety activities and/or decisions and the means to improve them.

## PLANET

### PROTECT OUR ENVIRONMENT

**lisi** is committed to protecting the environment and complying with the environmental rules applicable to the locations where it operates. LISI complies with all applicable environmental protection regulations when processing, using and disposing of hazardous materials and chemicals. This commitment is reflected by the fact that LISI is ISO 14001-certified.

**LISI THEREFORE UNDERTAKES TO:**

- Improve the environmental footprint of its business
- Continuously reduce its greenhouse gas emissions as part of a long-term decarbonisation strategy.

**lisi** identifies, monitors and works towards reducing its energy consumption, atmospheric emissions, waste, water consumption and aqueous discharge.

**LISI ASKS EVERYONE TO:**

- Strictly respect the rules applicable to waste sorting,
- Comply with energy conservation rules: e.g. turning off lights, heating, air conditioning when leaving a room and switching off machines that use energy unnecessarily,
- Report any incidents that may affect the environment.

### WORK WITH OUR TERRITORIES

**lisi** locations are important players in regional development and employment in their respective areas. For many years, LISI has maintained close links with local public and semi-public players, including schools, universities and local suppliers.





# PROFIT

LISI's sustainable economic development guarantees its future. For its development to be sustainable, LISI has set up a virtuous economic circle rallying financial partners, management, employees, suppliers, clients and other stakeholders around its long-term vision and its requirements for operational excellence and innovation. This virtuous economic circle thus determines day to day behaviour and attitude.

## GO BEYOND OUR CUSTOMERS' EXPECTATIONS

The relationships we build with our customers are the basis of our raison d'être and the mainstay of our sustainability. As a leader in our business and a key partner for our clients, our duty is to support them in their long-term development, share our know-how and dynamism with them and deliver ever more innovative and effective solutions to meet their challenges and advance together.

lisi makes every effort to offer competitive, quality products and services that meet the highest standards and level of excellence expected by our stakeholders. This commitment is recognised by independent organisations issuing the quality qualifications that govern our business activities (IATF 16949, EN 9100, ISO 13485, etc.). LISI continually measures its performance and constantly seeks to improve it.

Every LISI employee is individually and collectively committed and involved in meeting, anticipating and exceeding the expectations of all stakeholders.

Our customers' expectations also include the integrity necessary for any business relationship to prosper. Any commercial transaction involving LISI must generate a payment against the delivery of goods or services and must be evidenced by an invoice. No document issued or received by LISI may be falsified. No false or artificial data should be entered into LISI's accounting records.

## INVOLVE OUR SUPPLIERS

lisi's relationship with its suppliers is an essential factor of the company's success. LISI expects its suppliers to comply strictly with the laws and regulations applicable in the countries where they operate or where they meet LISI's needs, and to abide by the principles laid down by the UN Global Compact. This commitment is formalised in LISI's general terms and conditions of purchase and in the LISI Supplier Charter, which are ratified by each LISI supplier.

lisi is committed to developing a lasting partnership with its suppliers and to offering opportunities to increase business relations with each of its entities to secure mutual and lasting success. Indeed, a healthy and sustainable partnership with our suppliers optimises our overall costs in the long term, and thus our competitiveness and profits.

lisi LISI's suppliers must comply with ISO 14001 and ISO 45001 standards, as well as their future versions. They must also take steps to reduce their environmental footprint. Notably, LISI expects its suppliers to promote the development of human potential, to design environmentally responsible products, and to comply with the Conflict Minerals Act.

To perform its duty of care and to fight against corruption, LISI expects its suppliers to apply the LISI Code of Conduct. For this purpose, the LISI Code of Conduct is detailed in the general terms and conditions of purchase included in each contract entered into by LISI. Any commercial transaction generating a payment against the delivery of goods or services must be evidenced by an invoice. No document issued or received by LISI may be falsified. No false or artificial data should be entered into LISI's accounting records.

lisi provides its suppliers and all its stakeholders with an alert system on its website.

## SECURE OUR FINANCIAL RESOURCES

Securing our financial resources is a prerequisite for establishing the sustainability of the LISI Group. LISI therefore focuses its actions on sustainably increasing the company's value, through a policy of selective and profitable growth. Driven by a desire for permanent agility, LISI is constantly seeking to improve its performance by adapting its resources as closely as possible to its needs. Financial performance, as well as strategic excellence (foresight, resource allocation, use of assets), behavioural excellence (transparency, anti-corruption, social networks, confidentiality), operational excellence, digital excellence (cyber security). This performance must be reflected in the daily lives of each LISI Group employee.



### Excellence and Anticipation

lisi builds its quest for permanent excellence on quality. LISI constantly measures its results and is determined to achieve excellence in all areas of the company through continuous improvement. On a regular basis, LISI assesses the internal and external risks it faces in its environment and takes all necessary measures to protect its clients, employees, shareholders and other stakeholders.

### Accuracy of reported data

lisi assumes its duty and legal obligation to ensure the completeness and accuracy of the information it discloses in all the Company's reports and records.

#### THIS INFORMATION INCLUDES, BUT IS NOT LIMITED TO:

- Accounting and financial books and reports
- Key performance indicators (KPIs)
- Payroll and time management records
- Travel receipts and expense accounts

### Use of company resources and assets

It is the responsibility of each LISI employee to protect the Company's assets against any likelihood of misuse, waste, abuse, theft or loss and to ascertain that they are used for business purposes only. All LISI's resources and assets may only be used to meet the Company's needs or for purposes authorised by management.

lisi permits occasional and incidental use of computers, printers and communications equipment for personal purposes, but such use must be minimal. However, it is strictly forbidden to use the Company's IT or communication resources to consult websites displaying content of a sexual or violent nature, those offering gambling, advocating intolerance towards others, or those in contradiction with LISI's Values or interests. It is also inappropriate to use these same resources in a manner that affects concentration and productivity.

# 4.

## INTEGRITY, a shared responsibility



## Integrity in everyday life: the LSI code of ethics

### COMPLIANCE WITH APPLICABLE LAWS

**lisi** operates in various countries, each with different regulations. LSI is committed to respecting the regulations and standards of each country in which it operates. If one of its directives goes against local regulations, LSI applies the latter.

**lisi** conducts its business honestly and fairly, in compliance with applicable laws and regulations, including (but not limited to) laws and regulations relating to:

- Intellectual property
- Customs, trade and export control
- Protection of competition
- The fight against corruption (see below)
- The fight against fraud
- The fight against money laundering
- The fight against insider trading

### THE FIGHT AGAINST CORRUPTION

The LSI Group is committed to fighting all forms of corruption and influence peddling, whether or not they are detrimental to its business.

#### DEFINITION OF CORRUPTION & INFLUENCE PEDDLING

Bribery consists in soliciting or accepting, whether directly or indirectly, for oneself or for another person, proposals, promises, gifts, presents or any other advantage, with a view to acquiring or retaining business favours, directing business to another person, or obtaining any other undue advantage.

It also means performing an act within the framework of one's function, mission or mandate or of having facilitated it by one's function, mission or mandate, in exchange or in return for an advantage benefiting the person concerned or the Company.

Facilitating payments are corrupt acts in the form of payments to facilitate certain administrative procedures. This type of payment for valuable consideration is strictly prohibited by LSI.

Bribes are a form of corruption involving envelopes of money or transfers to hidden accounts in return for actions, influence or decisions. They can also take the form of a valuable object or service offered, such as a trip or a luxury item, for instance.

#### Definition of influence peddling

Influence peddling refers to the use by a person, for pecuniary or non-pecuniary reasons, of his/her real or supposed capacity or authority to influence a decision to be taken by a third party.

### GIFTS, MEALS AND ENTERTAINMENT

Gifts, meals and entertainment aimed at influencing a decision are considered as instances of bribery. If opportunities to be offered gifts, meals and/or entertainment arise, the following principles must be applied by LSI employees:

- They should not be subject to any compensation;
- They can only be accepted in full transparency with the recipient's line management;
- The only acceptable gifts are promotional items of reasonable value.

A meal and/or entertainment offered in the normal course of business may be accepted, provided that it meets the requirements below:

- It is essentially professional in nature;
- It must equate to a reasonable value and be recognised as such by LSI management;
- It does not violate any of the other provisions of the LSI Code of Conduct and does not damage the Company's reputation (e.g. adult entertainment);
- A representative of the company extending the invitation must be present;
- Any associated travel or accommodation costs are borne by LSI.

If there is any doubt regarding the value and/or suitability of accepting a gift, meal or entertainment, every LSI employee must seek the advice of his/her line manager.

Gifts or invitations that cannot be refused in the interest of business relationships should be collected and given equally to all employees in the company, according to the guidelines set by the relevant line manager (e.g. shared by lottery, or used for official and transparent recognition awards).

The granting of gifts and/or entertainment to third parties (representatives of clients or prospects, other partners or external authorities) requires the prior and formal approval of the Chief executive officer of the relevant Division or of LSI. This rule does not apply to promotional gifts (pens, notepads, calendars displaying the Company's logo, etc.), on condition that the object given does not create an obligation of reciprocity.



## CONFLICT OF INTEREST

A conflict of interest arises when the personal interests of LISI employees directly overlap with the interests of LISI and/or its subsidiaries, and the employee concerned is a decision-maker or has the ability to directly influence decisions. This case must be reported by the employee concerned to his/her line manager with a view to an independent decision.

## THIRD PARTIES

The anti-corruption policy applies to both direct and indirect payments. Payments made or received through a third party such as a consultant or distributor also violate this policy.

## CONFIDENTIAL INFORMATION

Some of the information received by LISI employees in the performance of their duties is confidential. It is each employee's responsibility to protect this confidential information and avoid unauthorised disclosure.

All non-public information which could be used by third parties and/or which could harm the Company if disclosed, including but not limited to the following, shall be considered confidential:

- Projects or business secrets,
- Lists of customers or prospects,
- LISI's business and/or product plans,
- LISI's manufacturing processes and working methods,
- LISI's business methods,
- LISI's computer software,
- Information about customers or employees.

The unauthorised use or disclosure of this confidential information by LISI employees, either by themselves or on behalf of third parties (internal or external) is prohibited, regardless of the third party (future or past employers for instance).

It is the responsibility of each employee to protect LISI from any risk of this confidential information being disclosed. This obligation remains in effect even after the possible departure of LISI employees, until such time as the information has become public.

Likewise, LISI employees may not disclose confidential information from a previous employer to management or other LISI employees.

## COMMITMENT TO CYBERSECURITY

All LISI employees and service providers are responsible for protecting LISI's information systems and its data. Cybersecurity guarantees LISI's long-term future and meets the expectations of its stakeholders. Inappropriate use of technology or data can expose the company to risks such as viruses, security breaches, data theft and loss. This can lead to cyber-attacks and hence a potential impact on the company's ability to do business.

Every LISI employee has the technology and data they need to carry out their work and is trained to use it in a secure way. It is therefore everyone's responsibility to use and protect LISI's technology and data, use them securely and appropriately and protect them against damage, loss, theft, alteration and unauthorised access.

### LISI REQUIRES EACH AND EVERY ONE OF ITS EMPLOYEES TO:

- Create and manage complex passwords
- Protect and never share these passwords
- Identify phishing and other fraudulent grooming attempts and immediately report any suspicious activity to their line manager

## BEHAVIOUR ON SOCIAL NETWORKS AND USE OF SMARTPHONES

Online social networks and digital platforms are generating new communication and collaboration opportunities for LISI. Accordingly, they bring with them new responsibilities that all LISI employees must be aware of and respect.

The following tips apply to all forms of digital interaction, including, but not limited to:

- General public social networks (eg: Facebook, Twitter, WeChat, TikTok, etc.)
- Professional social networks (eg: LinkedIn)
- Photo and video sharing websites (eg: YouTube, Instagram, Youku, etc.)
- Comments sections of blogs, online forums, etc.
- Miscellaneous apps.

All LISI employees are requested to act responsibly in their personal and professional interactions on social networks and to make sure that their reputation and that of LISI are protected at all times. When using social networks (even outside of working hours) and identifying themselves as LISI employees and/or posting comments about the Company, each LISI employee must:

- Be aware that they are accountable for what they write, publish or share.
- Never disclose confidential information about the LISI Group, its clients and/or suppliers.
- Make it clear that the opinions they express are personal and do not represent those of LISI.
- Refrain from any defamatory, offensive, threatening and/or insulting content.
- Not publish and/or upload pornographic and/or violent material.
- Show respect for colleagues and everyone associated with LISI, including customers and suppliers.
- Bear in mind that LISI's policy on discrimination and harassment also applies to social networks.
- Never publish documents, excerpts of documents, images, video or audio recordings showing or describing the interior of LISI's premises, or LISI's processes, products and/or employees, without the formal and prior authorisation of LISI General Management.

Any action that contravenes these instructions may be considered as misconduct or even gross misconduct.

The private use of smartphones and/or social networks in the workplace affects concentration and therefore has a negative impact on employee safety and productivity. The use of the internet/social networks for private reasons in the workplace, regardless of the device used (whether personal or professional), should therefore be kept to a minimum. For any legitimate reason (security, concentration, quality requirements, availability to others, quality of service, etc.), LISI authorises location managers to apply a stricter policy to be applied via memos and prohibit, for instance, the use of personal smartphones during working hours.

## Why report an integrity problem?

lisi intends to be recognised for its unflinching honesty and integrity.

The slightest suspicion that a manager, general manager or any other LISI employee is guilty of a small deviation from LISI's ethical standards can damage the reputation of our Company and/or cause serious harm to all of us.

## How and to whom should an integrity problem be reported?

Any employee who has reason to believe that LISI Code of Conduct has been, or may be breached, has a duty to report it. That can be done either internally or externally, to responsible authorities. Internally, the following resources are available to you:

- Your line manager;
- The site/plant manager and/or the Human Resources (HR) manager;
- The Chief Executive Officer of the Business Group or Corporate Function;
- The central HR department or the central LISI Legal department;
- LISI's reporting system.

If there is a valid reason not to use a particular resource, for instance because of confidentiality issues or the involvement of a line manager, it is possible to avoid/bypass one or more of these resources.

The LISI reporting system is accessible via the "Ethics" section of the LISI Group website:  
<https://www.lisi-group.com>



This system is used to make reports in all the languages of the countries in which the LISI Group operates. It can be used by employees as well as by third parties (suppliers, customers and any other "stakeholders").

When using LISI's internet reporting system, whistleblowers must provide their full name and a valid professional or personal e-mail address. Anonymous reports are rejected by LISI, because:

- They are not part of the LISI Group's corporate culture;
- They prevent an effective and efficient investigation of the facts, which can only be conducted on the basis of a direct discussion with the whistleblower (by telephone, video conference or face to face).

### ONCE THE ALERT HAS BEEN TRIGGERED, THE WHISTLEBLOWER RECEIVES TWO AUTOMATICALLY GENERATED E-MAILS:

- The first e-mail containing a report number,
- A second e-mail with a password and a link to be used to access the electronic reporting form. The report is sent by the system, securely and confidentially, to the LISI Compliance Committee. The Compliance Committee responds via the system, always confidentially and securely.

If deemed necessary, the Compliance Committee appoints an experienced professional to investigate the reported or alleged facts.

Unless the whistleblower agrees to waive his/her anonymity, his/her identity is not revealed. However, whistleblowers should be aware that in some cases an investigation is only possible if the identity of the whistleblower is revealed, pending terms to be agreed between the company and the whistleblower.

Based on the results of the investigation, appropriate decisions are taken and implemented with the support of the relevant management division, HR department and/or legal department.

## What to do in case of grave or imminent danger

In case of grave or imminent danger, LISI employee shall contact their local management, the emergency services and can resort to competent authorities or public disclosure. The LISI reporting system should not be used to report events that pose an immediate threat to life or property. Reports submitted through this system may not receive an immediate response.

## Any hesitation about reporting? LISI protects whistleblowers

If there is any hesitation, the whistleblower should know that LISI has a policy of non-retaliation. In fact, LISI does not tolerate any reproach being made at a person who has reported a breach in good faith. This policy therefore protects people who report in good faith.



A white line graphic that starts as a horizontal line from the left edge, curves downwards at the right end, and then continues as a diagonal line extending towards the top right corner of the page.

**lisi**