



# Group Rules & Policy

Subject - Group Ethic & Decent work Policy

Ref. POL-001

From – Group Headquarter

To - Internal / External

(employees, managers, providers, industrial and commercial partners)

MàJ / Update – 2024.04

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## INTRODUCTION

The Code of Ethics is the common reference document for all our managers and employees worldwide, regardless of the continent or country where the GINDRE Group operates, in the diversity of cultures, as well as for all our customers and stakeholders.

- All employees must understand and adhere to the values, guiding principles set in this Ethic Policy.
- Our industrial and commercial suppliers and partners are required to apply the usual standards recognized internationally, in particular with regard to their employees.
- Managers must comply with this Ethic Policy and ensure that their teams have been informed of its existence and contents.

## GROUP VALUES

With its 200-year history, GINDRE Group succeeded to evolve while maintaining its family-friendly entrepreneurial spirit on a human scale. Its continued international growth is based on a strong culture maintained and enriched by our people from all around the world.

Today, our teams and the global community, they represent, are our greatest strengths. We are proud of our culture and our core values which are the base of our Groupe policy.

The GINDRE Group relies on the sustainable and global collaboration of all its people. Sharing common values promote our sense of belonging. It guides our individual and collective actions and contributes to make all of us working in the same direction, looking for the same future for our Group (and above) and improve our individual fulfillment.



INNOVATION



SUSTAINABILITY



COMMITMENT



MINDFULNESS



COOPERATION

### Innovation

Promote innovation through a continuous improvement process as a guideline in all our actions. Promote an agile organization, stay open to new ideas and market evolution for our internal and external customers growth and success.

The world changes, we change with it!

### Sustainability

Integrate sustainability, ethics, and accountability into all our decisions and actions.

### Commitment

Taking ownership of our actions, promote leadership, empowerment, and entrepreneurship within the organization in order to put our commitment at the service of our partners expectations.

### **Mindfulness**

We care about our employees, promoting their growth in a safe and balanced work life environment. We care about our partners, creating fair and sustainable business conditions. We care about our planet, our social and environmental impact.

### **Cooperation**

Adopt a collaborative teamwork approach towards our people, our customers and our suppliers based on integrity, honesty, loyalty, and respect.

## **ACTION PRINCIPLES & PRIORITIES**

### **Respect for people and partners**

Women and men are the GINDRE Group's most precious asset. Based on our Group values, respect for people is the foundation stone for relationships between employees and/or partners of the Group. It is the heart of our long-term relationship with our customers and our stakeholders.

The role of management is essential to set an example and provide our teams with a professional environment conducive to the development of their skills and the expression of their talent in a safe and secured work environment.

### **Customer focus**

The GINDRE Group Commit its effort to meeting customer expectations. It needs the full commitment of each and every employee, sponsored by the Group quality policy which aims to reach both services and product quality excellency. GINDRE Group puts innovation at the heart of continuous product and process performance improvement.

### **Legal compliance**

The GINDRE Group complies with applicable national and international laws and standards. Each employee is required to avoid any activity or conduct likely to put the Group in illegal situations that could damage its reputation. In accordance with laws applicable to our business and the GINDRE Group's rules, failure to comply with these principles may result in disciplinary action and/or legal proceedings, both for the Group and the person at fault

### **Create sustainable value**

As experienced and full committed player in facing the energy challenges of tomorrow, the GINDRE Group care about our planet, our social and environmental impact. We aim to create value for our entire ecosystem to ensure the sustainability and development of our company, partners and environment. The GINDRE Group integrate sustainability, ethics and accountability into all our decisions and actions, and expect all our internal and external partners to do so.

## **PEOPLE & HUMAN RIGHTS**

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### **UNITED NATIONS PRINCIPLES**

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The GINDRE Group fully embrace the United Nations Guiding Principles on Business and Human Rights, endorsed within the resolution 17/4 of 16 June 2011 of its Human Rights Council, implementing 'Protect, Respect and Remedy' Framework, to address issues of human rights and transnational corporations and other business enterprises; including the following principles of corporate responsibility to respect human rights:

## ***“Foundational principles***

*Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.*

*The responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.*

*The responsibility to respect human rights requires that business enterprises:*

- (a) Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur;*
- (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.*

*The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise’s adverse human rights impacts.*

*In order to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including:*

- (a) A policy commitment to meet their responsibility to respect human rights;*
- (b) A human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights;*
- (c) Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.*

## ***Operational principles***

### ***Policy commitment***

*As the basis for embedding their responsibility to respect human rights, business enterprises should express their commitment to meet this responsibility through a statement of policy that:*

- (a) Is approved at the most senior level of the business enterprise;*
- (b) Is informed by relevant internal and/or external expertise;*
- (c) Stipulates the enterprise’s human rights expectations of personnel, business partners and other parties directly linked to its operations, products or services;*
- (d) Is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties;*
- (e) Is reflected in operational policies and procedures necessary to embed it throughout the business enterprise.*

### ***Human rights due diligence***

*In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. Human rights due diligence: (a) Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships; 18 (b) Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations; (c) Should be ongoing, recognizing that the human rights risks may change over time as the business enterprise’s operations and operating context evolve.*

*In order to gauge human rights risks, business enterprises should identify and assess any actual or potential adverse human rights impacts with which they may be involved either through their own activities or as a result of their business relationships. This process should:*

- (a) Draw on internal and/or independent external human rights expertise;*

*(b) Involve meaningful consultation with potentially affected groups and other relevant stakeholders, as appropriate to the size of the business enterprise and the nature and context of the operation.*

*In order to prevent and mitigate adverse human rights impacts, business enterprises should integrate the findings from their impact assessments across relevant internal functions and processes, and take appropriate action.*

*(a) Effective integration requires that:*

*(i) Responsibility for addressing such impacts is assigned to the appropriate level and function within the business enterprise; 21*

*(ii) Internal decision-making, budget allocations and oversight processes enable effective responses to such impacts.*

*(b) Appropriate action will vary according to:*

*(i) Whether the business enterprise causes or contributes to an adverse impact, or whether it is involved solely because the impact is directly linked to its operations, products or services by a business relationship;*

*(ii) The extent of its leverage in addressing the adverse impact.*

*In order to verify whether adverse human rights impacts are being addressed, business enterprises should track the effectiveness of their response. Tracking should:*

*(a) Be based on appropriate qualitative and quantitative indicators;*

*(b) Draw on feedback from both internal and external sources, including affected stakeholders.*

*In order to account for how they address their human rights impacts, business enterprises should be prepared to communicate this externally, particularly when concerns are raised by or on behalf of affected stakeholders. Business enterprises whose operations or operating contexts pose risks of severe human rights impacts should report formally on how they address them. In all instances, communications should:*

*(a) Be of a form and frequency that reflect an enterprise's human rights impacts and that are accessible to its intended audiences;*

*(b) Provide information that is sufficient to evaluate the adequacy of an enterprise's response to the particular human rights impact involved;*

*(c) In turn not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality.*

#### Remediation

*Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes.*

#### Issues of context

*In all contexts, business enterprises should:*

*(a) Comply with all applicable laws and respect internationally recognized human rights, wherever they operate;*

*(b) Seek ways to honour the principles of internationally recognized human rights when faced with conflicting requirements;*

*(c) Treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever they operate.*

*Where it is necessary to prioritize actions to address actual and potential adverse human rights impacts, business enterprises should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable."*

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## **GROUP HR POLICY**

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The GINDRE Group HR Policy is built on 5 pillars.

### **Be a guardian of our values**

Innovation, sustainability, commitment, mindfulness, and cooperation are the foundation of all our relationships: both within the Group and with our business partners. They are the foundation on which we define our strategic priorities.

That is why our entire human resources policy (training, development, mobility, compensation and other benefits) focuses on promoting these values that make our Group one of the world leaders in the copper industry.

### **Ensure a safe working environment**

The activities in which we operate are inherently subject to occupational risks. It is the duty of each of our employees to make health, safety and well-being at work a priority. In this context, we expect our entire management to play an essential role in making everyone feel involved and responsible for their work environment.

### **Encourage initiative and personal development**

Our goal is to allow everyone to find their place in the organization, to be an actor in its development and to grow with the Group. We promote internal mobility, whenever possible. We want our employees to cultivate their employability and receive a fair recognition of their investment (notably through our compensation policy).

### **Promote an open and constructive social dialogue**

We want to promote the expression of all our employees. The contribution of the collective is a powerful performance tool (working groups, surveys, etc.); that is why we encourage a close dialogue between management and employees.

The GINDRE Group also guarantees the freedom of association of its employees and the effective recognition of the right to collective bargaining. We cultivate a trusting dialogue with the social partners.

### **Promote diversity**

Gindre mobilizes for the acceptance of the other in all its difference. We support social and solidarity actions, convinced that it is the duty of our company to bear our share of social responsibility.

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## **SAFETY & SECURITY FOCUS**

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We comply with all applicable laws and regulations regarding wages, benefits, hours of work and minimum age.

We pay fair and decent wages; and invest in the professional development and promotion of the employability of our people, convinced that the growth of the Group cannot be achieved without the one of its teams.

We diligently protect the privacy of our employees and the integrity of their personal data.

As part of our Group values and referring to our Group security policy, the GINDRE Groupe is fully committed to safety and well-being in the workplace. Offering everyone a safe and healthy working environment is one of our Group's strategic priorities. Whatever the workplace, office, workshop, or factory, each of us is an actor in our working environment.

This includes strict adherence to applicable health and safety protocols and immediate reporting of any hazards, unsafe practices, threatening or violent behavior, and drug and alcohol use.

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## **NON-SLAVERY**

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The GINDRE Group prohibit, for itself and its partners, usage of modern slavery (slavery, servitude, forced or compulsory labor, and human trafficking).

The GINDRE Group, based and above local regulations, implements Group rules against modern slavery, and/or regularly review the rules currently in place, and ensure that employees, suppliers, and other contractors are informed; take appropriate action when an employee / partner is not acting in accordance with these rules.

## **BUSINESS COMPLIANCE**

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### **CONFLICT OF INTEREST**

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Persons present at any level of the organization must ensure that their activities and personal interests, direct or indirect, do not conflict with those of the Group. Each member of the Group must be able to take each decision objectively, in the best interest of the company. Any potential conflict of interest must be reported.

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### **FIGHT AGAINST CORRUPTION**

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We strongly prohibit any form of corruption in our properties with our business and institutional partners and with the administration. No engagement or in-kind gratuity may be given for the purpose of obtaining an advantage or may be received for the benefit of a business or a person.

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### **COMPETITIVITY**

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In all the countries where we operate, the GINDRE Group scrupulously respects the rules and laws relating to competition. These guarantee the autonomy of market participants and open and fair competition in the interests of all stakeholders. Any offence is punishable by heavy penalties, even criminal convictions, for the company and the employee concerned.

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### **FRAUD AND MONEY LAUNDERING**

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The GINDRE Group pays all taxes and charges due in the countries where we are present. We refuse any transaction that could be suspected of being money laundering and we undertake to alert the competent authorities if the case arises.

## **CORPORATE SUSTAINABILITY**

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### **ENVIRONNEMENT CARE**

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As solution provider for future energy challenges, the GINDRE Group obviously takes into account respect for the environment throughout the overall production cycle of its services and products, starting by sourcing recycled raw material.

We also integrate it into our daily activities by seeking to reduce our consumption of water, energy or paper, according to our environmental engagement, policy and our Group values. And we support any initiative to preserve the environment.

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### **SOCIAL RESPONSIBILITY**

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We assume our economic and social responsibility within the territories where we operate. Beyond the jobs we generate, we encourage the citizen involvement of our employees and their associative commitment, whether in a fully personal capacity or within the framework of actions supported by the Group.

## ALERT PROCESS

Faced with a delicate situation, the GINDRE Group expects each and every of our employee, while having a doubt, adopting the following expected attitude:

### Act decisively, asking the right questions:

- Is my action or decision in accordance with the law?
- Is my action or decision consistent with the Ethics Policy and the rules of my jurisdiction?
- Can my action or decision have a negative impact, in human, financial, environmental or reputation terms, on the company, my professional entourage or my stakeholders?
- Am I prepared to take my action or decision transparently if it comes to light?

### Don't stay alone with a problem and don't hesitate to ask for advice:

- their colleagues, their local manager, their Human Resources or subject referent contacts.

### Question and alert:

Actors of ethics are available within the GINDRE Group. In our Group, the warning system is based on an escalation process.

## ESCALATION PROCESS

Escalation management prioritizes issues, assesses them based on their severity, and ensures that appropriate representatives are assigned to their treatment. In this context, the first point of contact for our employees remains their direct management who is responsible for relying on the subject's reference contacts to address directly or escalate the request.

## SUPPORTS & CONTACTS

The Group's Executive Management is responsible for approving this section and monitoring its implementation. The day-to-day management of the principles and rules laid down in this policy belongs to all the departments concerned, and more specifically to the following departments.

GINDRE Groupe contacts and governance:

- Human resources headquarter: Health safety & security, Human rights and well-being, labor relations
- Finance headquarter: Business compliance
- Information technology Group department: General Data Protection Regulation (GDPR)
- Quality department: Environment, management process compliance



**Philippe Michel**  
CEO

ANNEXES	REF.
SECURITY & SAFETY POLICY	POL-002
QUALITY POLICY	POL-003
ENVIRONNEMENTAL POLICY	POL-004