

CORPORATE RESPONSIBILITY

DOURDIN Group

DOURDIN S.A.S.
DOURDIN ROMANIA S.R.L.
DURDEN
DOURECA

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PREAMBLE

Our sustainable growth strategy is based on ongoing investment in our Research and Development; it allows us to offer innovative products, while respecting the highest requirements. We strive for excellence and do not hesitate to continually challenge ourselves and reconsider the way we work. We value honesty and clarity. We build strong and lasting relationships with our customers and suppliers based on mutual trust and interest. We act with integrity : we respect the laws of the countries where we operate and we promote good CSR practices in our governance.

We respect high accounting and reporting standards and support the fight against corruption. We provide our shareholders with long-term profitability by protecting and making the best use of the group's assets.

As DOURDIN Group, we are aware of the impact of our activities on the environment, and we strive to minimize it.

We are determined not to compromise the future in the name of the present.

We make a positive contribution in the countries and communities where we are present.

We respect local cultures and sensibilities.

We are committed to respecting human rights.

We want to contribute without compromising on the abolition of child labor as well as forced labor.

We are actively seeking and supporting partners who share our values and ethical commitments.

Our clear vision and values are shared by all employees. This framework gives meaning and thus represents a fundamental pillar of relations within the DOURDIN Group.

RESPECTING THE LAW

Whether as a company or as an individual, the fundamental rule is above all to respect the laws and regulations of the countries in which DOURDIN Group operates.

We attach particular importance to the respect, in the spirit and in the letter, of the law in the following fields :

- Human rights
- Prohibition of child labor and forced labor,
- Compliance with the laws against discrimination, provisions regulating hours of work and remuneration, laws providing for the collective representation of employees
- Quality, health and safety standards
- Environment
- Corruption
- Taxation

DOURDIN Group wishes to share these principles with its commercial partners and to ensure, as far as possible, that they comply with these same laws and regulations.

RESPECTING THE ENVIRONMENT

DOURDIN Group respects the environment and strives to minimize its ecological impact. It is everyone's responsibility to seek to reduce this impact when possible. In this field, every little gesture matters. Each of us should contribute to environmental initiatives in accordance with DOURDIN Group's environmental policy.

Decarbonisation

Dourdin Group is fully involved in decarbonisation of its activities.

Energy efficiency

As main target in order to decrease Carbon impact Dourdin is focusing on energy saving at each step of its processes

Renewable energy

Use of renewable energy is a strategic topic for the company

Sustainable resources management

All factories of Dourdin Group are certified ISO 14001 and are managing this topic. More details are available in site environmental policy

Waste reduction

All factories of Dourdin Group are certified ISO 14001 and are managing this topic. More details are available in site environmental policy

Reuse and recycling

All factories of Dourdin Group are certified ISO 14001 and are managing this topic. More details are available in site environmental policy

Animal welfare

As supplier of automotive industry, Dourdin Group is not facing this topic. If our market would evolve we would be vigilant on this concern

Biodiversity, land use and deforestation

All factories of Dourdin Group are certified ISO 14001 and are managing this topic. More details are available in site environmental policy

Soil quality

All factories of Dourdin Group are certified ISO 14001 and are managing this topic. More details are available in site environmental policy

Droit à la concurrence

Competition law prohibits any commercial practice aimed at preventing, hindering or distorting competition (e.g. price fixing or market or customer sharing agreements).

DOURDIN Group supports all efforts aimed at encouraging or protecting competition, including the legitimate protection of intellectual property and marketing rights.

Employees who encounter competition issues in their work should understand the basic principles of competition law and know why it is important to comply with them. If in doubt about a specific point of this right, employees should seek help and advice.

Violations of competition law are severely sanctioned. In addition to the responsibility of DOURDIN Group as a company, employees who resort to anti-competitive practices are exposed to sanctions.

DOURDIN Group employees involved in a market response process must know and comply with applicable laws. Transparency should be ensured throughout the procurement cycle by respecting applicable formal procedures and providing decision makers with accurate, transparent and non-discriminatory data.

DOURDIN Group respects the legitimate initiatives of its competitors. However, we expect them to comply with applicable laws, regulations and industry codes.

Conflicts of interest

DOURDIN Group employees have a duty to act in the interests of the company. Personal interests should never influence, or appear to influence, a decision about any business matter. This charter applies to all DOURDIN Group employees.

The term “conflict of interest” has a very broad meaning. In general, it refers to a situation where a person is able to make a decision or influence a decision relating to the business of DOURDIN Group, while his personal interests, or those of his related parties, differ from those of DOURDIN Group. You are required to avoid any situation that would put you in conflict of interest with DOURDIN Group or could be perceived as such by others. If you are in a conflict of interest with DOURDIN Group, or believe that a conflict of interest is very likely to arise, you are required to disclose this conflict as soon as the opportunity arises.

Fraud and money laundering

Fraud techniques are ever more numerous and sophisticated, especially with the digital transformation. In this context, each employee has a role to play in this prevention. It is thanks to the daily vigilance of each employee that we can prevent and detect attempts at fraud, whether internal or external.

- External fraud is the act of individuals, isolated or in groups, customers or not, acting with a view to obtaining funds, documents or information that can be used for their benefit at the expense of a company, its customers or third.
- Internal fraud is characterized by the malicious act of an employee to the detriment of his company or the interests of a third party managed by the company.
- It can also be characterized by a malicious act carried out with the complicity of individuals outside the company, in which case we speak of mixed fraud.

Subject to strict obligations in this area, we participate in the fight against fraud, money laundering and the financing of terrorism. Money laundering is an action aimed at concealing the origin or nature of income derived from criminal activities. Employees are an essential link in the system put in place within the Group. Employees scrupulously respect internal procedures in the fight against money laundering and the financing of terrorism. When they suspect a case of fraud, money laundering or terrorist financing, employees inform Management.

Financial responsibility (Accurate Records)

DOURDIN is fully committed to respect the best practices.

Fair competition and anti-trust

DOURDIN is fully committed to respect the best practices.

Counterfeit parts

DOURDIN is fighting the use of counterfeit parts

Intellectual property

DOURDIN is fully committed to respect the rules concerning intellectual property

Export controls and economic sanctions

DOURDIN is fully committed to respect the best practices.

Code of conducts and ethics and ethics escalation policy

We all have an obligation to ensure that all information in our financial or other documents is accurate. In particular, it is important to provide our shareholders with transparent, accurate and reliable information.

Each of us must :

- Contribute to ensuring that information in financial and professional documents is always accurate
- Keep these documents safe and follow the archiving guidelines
- Cooperate with internal or external auditors
- Make sure not to sell, transfer or dispose of any property belonging to DOURDIN Group without the necessary authorizations and documents

Anyone working for or with DOURDIN Group is entitled to a safe, healthy and safe work environment. Each of us must:

- Respect the rules of the Society on hygiene, health and safety at work
- Take all reasonable precautions to maintain a safe and healthy work environment
- Ensure that his actions do not pose a risk to himself or others
- Make sure he knows what to do in case of an emergency in the workplace
- Report to the hierarchy any harassment situation, any behaviour, installation or situation likely to compromise the safety of our work environment, as well as any accident, even minor
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Anti-bribery policy

We never bribe or improperly influence our commercial partners or any government officials.

A government official can be an officer, employee or representative of a government agency or an employee of a government owned or controlled business. The term is defined broadly, includes family members of officials and can apply even if the government connection is not obvious, such as in the case of a company general manager where a foreign government owns a controlling interest in the company.

There are many international laws that prohibit bribery and corruption, EU Legislation on anti-corruption (Council Framework Decision on combating corruption in the private sector, / Convention on fighting corruption involving officials of the EU or officials of EU countries) and similar anti-corruption laws adopted by many other countries. Importantly, even if bribes are described as being a local custom or are small in amount, they are almost always illegal and against Company policy.

Both individuals and the Company can be punished severely for violations of anti-corruption laws and no potential business opportunity can outweigh our reputation for integrity. We never agree to directly or indirectly offer, promise or pay anything of value to influence the decision making of a government official or any of our commercial partners. We do not solicit or accept bribes for ourselves or on behalf of the Company.

We work with many third parties, some of whom may act on our behalf or even interact with government officials. Therefore, we must be careful when engaging these third parties and must monitor their activities on our behalf. Since our third parties are subject to the same anti-corruption requirements that we are, we do not conduct business with any third party who bribes or accepts bribes on our behalf.

The practice of providing or accepting gifts or other gratuities, such as meals or entertainment, may be acceptable if the gift or gratuity is: (1) associated with a business purpose, appropriate as to time and place, and of nominal value; (2) legal under applicable anti-corruption laws (e.g., EU Legislation on anti-corruption and similar anti-corruption laws adopted by other applicable countries). Before you extend a gift or other gratuity, you should determine the policy of the recipient's employer. Also, be prepared to decline diplomatically any gift or other gratuity offered to you that does not meet the above-stated policies.

Child Labor

DOURDIN is determined to contribute without compromising on the abolition of child labor

Modern Slavery

We want to contribute without compromising on the abolition of forced labor or modern slavery.

Ethical recruiting

DOURDIN is fully committed to respect the best practices.

Freedom of association and collective bargaining

DOURDIN is fully committed to respect the best practices.

Non-discrimination and harassment

The Group will not tolerate harassment in the workplace. Not only is harassment occurring in the workplace a violation of the company policy, it is also a violation of law.

Unlawful harassment includes behaviour toward another person based on that person's race, color, religion, national origin, sex, sexual orientation, age, disability or other characteristic protected by either applicable law or specific corporate policy, which is unwelcome and personally offensive to its recipient and (1) an intimidating, offensive or hostile work environment, or (2) unreasonably interferes with the person's work performance. Any employee who violates this policy will be subject to disciplinary action, up to and including immediate termination of employment. Any contractor, supplier or customer representative who engages in such conduct will be removed from the work site, if appropriate.

Likewise, the Corporation will not tolerate violence in the workplace.

Women's rights

DOURDIN is fully committed to respect the best practices.

Diversity, equity, and inclusion

DOURDIN is fully committed to respect the best practices.

Rights of minorities and indigenous peoples

DOURDIN is fully committed to respect the best practices.

Land, forest and water rights and forced eviction.

DOURDIN is fully committed to respect the best practices.

Use of private or public security forces

DOURDIN is fully committed to respect the best practices.

Vital Salary

DOURDIN is engaged to respect the laws about minimum wages when it is defined.

DOURDIN is committed to grant vital wages to all his direct and indirect workers where no regulation exists

DOURDIN will check every years the level of wages paid with an IDH methodology

WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

Any member of DOURDIN Group will launch the alert to the Top Management in case of non-compliance with this ethical code DOURDIN.

Whistleblowers will be protected against retaliation.