

# CODE OF ETHICS

#5 – March 2023



PRAYON



[www.prayon.com](http://www.prayon.com)

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# INTRODUCTION

## OUR COMMITMENT

**Enriching daily life through phosphorus chemistry** is Prayon's mission. The vision is to make a difference via technology, whilst still remaining true to our core values.

**Safety** is a top priority. Everyday we work to make our sites safer and our facilities more secure, to enhance **foodstuffs safety** and to make sure that our products are used safely. Our desire for **continuous improvement** which safeguards human **health** and our **environment**, are also core principles.

With our committed, diverse and talented team, Prayon **offers creative solutions** to our partners by adopting design **efficient** and **sustainable processes**. In addition, we continue to **provide products and services with high added value**.

We are keen to strengthen Prayon's long-term future via a strategy of **excellence** and **profitability** which will result in added value for staff and shareholders alike.

We are careful to **listen to both customers and the market** and in this context, we supply top-quality services and products and provide the very best application support.

Against the backdrop of a highly competitive market, we must continually seek to **innovate**. We encourage our staff to be creative and **to enhance their skills and expertise** through appropriate training. Recognizing performance and acknowledging achievement is a core value for us in terms of motivating and rewarding our staff.

The Group's **Management System** plays a crucial role in helping us to achieve our goal of improving risk management. Implementing and monitoring this system rigorously across all the Prayon Group's units is vital in order for us to roll out action plans the results of which can be verified and recognized.

Prayon recognise this Commitment by complying with all relevant legislation, standards, agreements and contracts with partners and customers. The Commitment is a core requirement and is essential to ensure Prayon's long-term future.

Geoffrey Close, Chief Executive Officer

## OUR MISSION

### Enriching daily life through Phosphorus Chemistry

#### Enriching daily life through Phosphorus Chemistry

Phosphorus chemistry is vital to our daily lives. It is everywhere. That's why at Prayon, we are passionate about what we do and who we do it for.

We get up every morning committed to provide the growing population with nutritious and qualitative food and to deliver innovative products

to many other sectors ranging from petfood, and oral care to chemical, construction, and to the pharmaceutical industry. We make everything

better. At Prayon, we are proud to deliver innovative, technical solutions, world-renowned equipment and high-quality products that set the tone in the phosphate world.

## OUR VISION 2025

### Our Technology makes the difference

With an **engaged, diverse and talented** Team :

- **Providing creative solutions to our partners**
- **Delivering high value-added products and services**
- **Designing efficient and sustainable processes**

Since its creation, technology is in the DNA of Prayon. Together, as a team of **talented, diverse and engaged** collaborators, we have the ambition to further leverage technology to make the difference in people's lives, communities and our planet.

#### – Providing creative solutions to our partners

In every aspect of our activities, we think expansively. We are driven to go the extra mile. Renewing ourselves every day, we imagine creative solutions to our partners - our customers, our providers, our staff and all our stakeholders- delivering excellence.

#### – Delivering high value-added products and services

We want to make the difference by listening to our customers and anticipating their expectations to deliver reliable, high value-added

solutions ranging from achieving better yields in tomato culture, improving cured meat quality to designing cutting-edge phosphate production

plants and much more. In brief, we want to be part of our customer success.

#### – Designing efficient and sustainable processes

We are committed to developing more efficient processes, protecting resources, fostering circular economy and inventing new ways of working. This is the way to build a more sustainable future for the planet.

## OUR VALUES

### We aim far

- We build trusted relationships with our people and our partners
- We undertake for long term value creation for our entire ecosystem
- We focus on our mission and vision



### We aim high

- We continuously strive for efficiency, effectiveness and quality
- We innovate to excel
- We approach every hurdle as an opportunity to go the extra mile



### We aim together

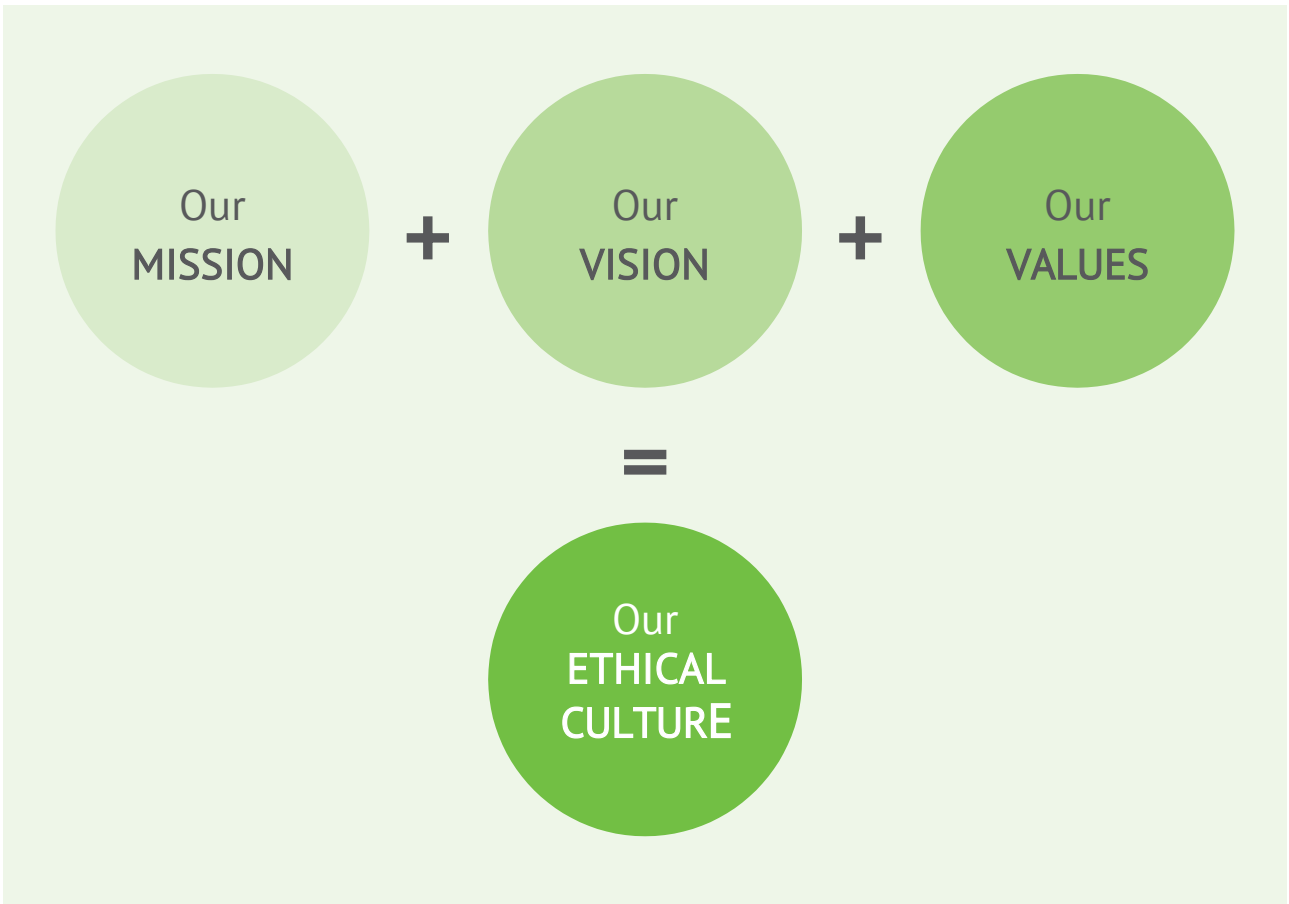
- We communicate openly and with kindness
- We interact in a modern, authentic and professional way
- We are inclusive and we foster work-life balance



### We deliver

- We act as role models and deliver on our promises
- We commit on safety and environmental responsibility
- We recognize people's commitment, successes and progresses





# A CODE OF ETHICS?

## THE AIMS OF OUR CODE OF ETHICS

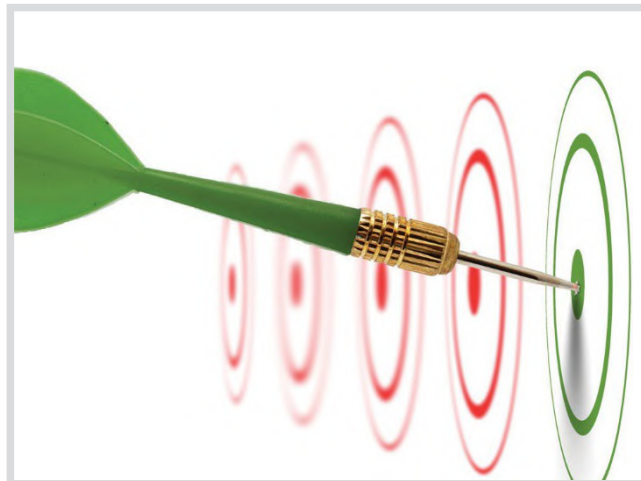
Our company has forged a solid reputation based on strong values handed down from one generation to the next, allowing us to calmly continue growing as a leader in our sector.

If we want to remain a leader, we believe that we have to carry out our activities in line with our ethical principles as well as the laws and regulations in force. Owing to our expertise in phosphate chemicals and our international scope, we must set an example as a socially responsible company in order to serve our customers perfectly and in the interests of all those involved.

This code is a guide to making these principles a reality.

Our code of ethics (hereinafter referred to as 'our code):

- **encourages** us all to behave responsibly and ethically;
- **helps** us all to make ethical decisions;
- **confirms** the importance of us all acting in accordance with the laws, regulations and professional ethics rules in place in all countries in which we are active, as well as elsewhere around the world.



## WHO IS OUR CODE FOR?

Our Code applies to all those employed by the Prayon Group, namely members of the Management Board, the Leadership Council, executives, employees and workers, whether contractual or temporary, full time or part time.

The pronoun 'we' is used to highlight the inclusive nature of such a document. We also encourage our suppliers and partners to read and respect our code.

## WHAT IS THE CODE OF ETHICS?

Our code is none other than the core that details Prayon's desired standards of conduct for all of its activities. It comprises standards of conduct that are typically more stringent than those required by the legislation in force in the countries in which the Company is active.

It combines a series of principles/values regarding professional behaviour and the conduct of Prayon personnel. Our code is also a written reflection of the Company's public commitment to these principles/values.

Our code does not substitute the legal rules that apply in a given situation or area, nor can it contradict the obligations duly set out in contracts or collective agreements in a given situation.

Furthermore, it is not an exhaustive regulation within the company. Prayon also has internal control standards and rules that differ from (but are compatible with) the code of ethics that have been duly approved and disseminated within the organisation; staff must consequently be familiar with and implement these rules and standards.

## WHAT DO WE EXPECT FROM OUR STAFF?

### ALL STAFF

All members of staff are expected to:

- **perform** their tasks fairly and with integrity;
- **help** to achieve Prayon's goals to the best of their ability and make decisions, without compromise, that fully comply with the code;
- **be** familiar with the basic principles applicable to their work;
- **with regard to any questions relating to the code, consult** their immediate superior, their HR officer, the Legal Department, their immediate superior's superior, or their department manager.

Any employee aware of a potential violation of the code must:

- in good faith, immediately notify their immediate superior, their HR officer, the Legal Department, the superior of their immediate superior, or their department manager;
- if the potential violation has not been dealt with after it has been reported to their superior, take the matter directly to their HR officer, the Legal Department or a more senior manager.

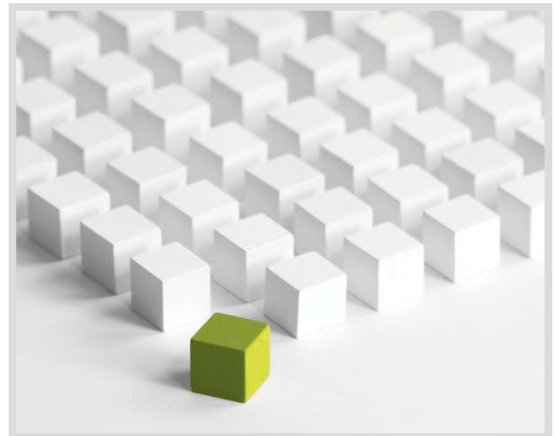
## MANAGEMENT AND EXECUTIVES

In addition to the responsibilities mentioned above, anyone in a management or executive role within Prayon must:

- **promote** the applicability of the code in their workplace;
- **serve** as a role model by behaving in line with high ethical standards and fostering a workplace that wholly reflects the code;
- **be** vigilant in order to prevent any violations of the code;
- **protect** anyone who reports a violation of the code.

## WHAT IS THE DIFFERENCE BETWEEN LAW, PROFESSIONAL ETHICS AND ETHICS?

- ‘Law’ refers to an enforceable legal text (law or regulation).
- ‘Professional ethics’ refers to rules that govern behaviour, including a company’s rules and guidelines, a code of conduct, or a code of professional ethics specific to a profession (e.g. engineers, town planners).
- ‘Ethics’ refers to critical reflection in a given situation, taking into account the company’s mission, vision, values and rules, as well as the potential consequences for others, with a view to determining the best course of action under the circumstances.



## INCORPORATING THESE CONCEPTS INTO OUR DECISION-MAKING PROCESS

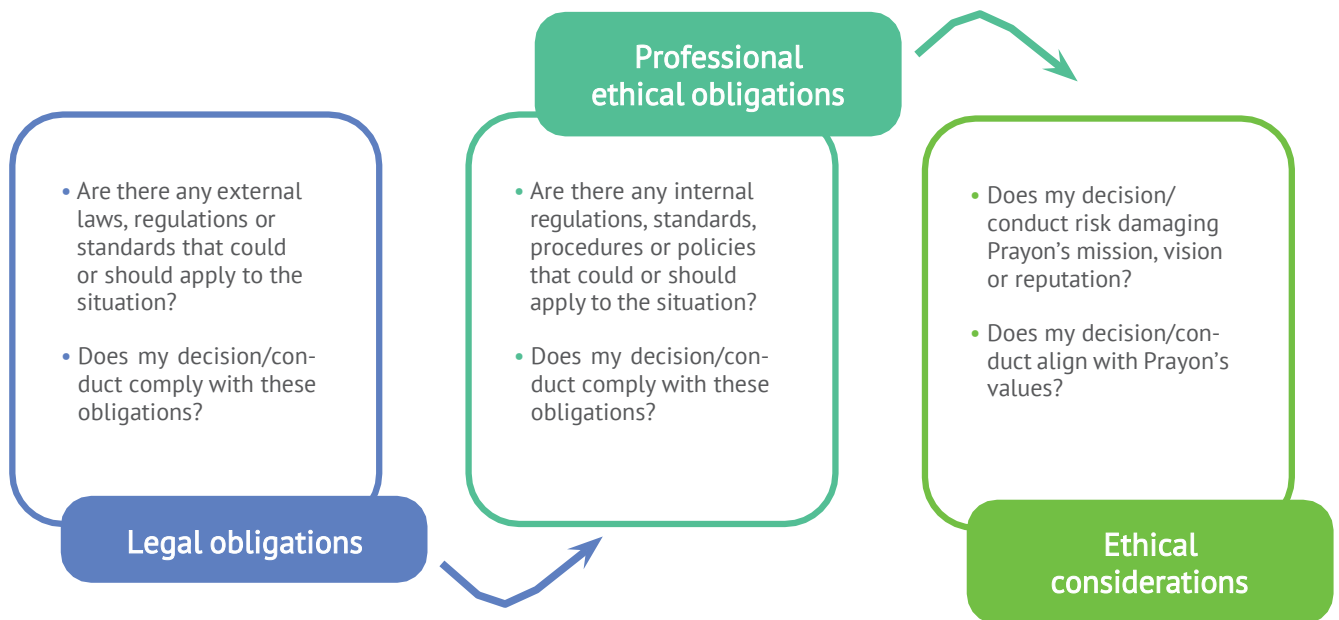
We must always make sure to respect the applicable legal texts and rules of professional ethics. Should these fail to provide a clear indication of the best course of action, we then have to turn to our own ethical culture (mission, vision and values) to take a decision in Prayon’s best interests.

Below are several steps and questions that can serve as a guide when the rules seem inadequate, we are unsure or feel uneasy in a given situation, or when it is difficult to identify the right thing to do.

We must first ask ourselves the following questions:

***What are the exact facts? What are the issues? What objective information do I have? What are the potential options?***

Once we have all of this information to hand, it is vital that we run through the steps outlined below before making any decisions:



## REPORTING A VIOLATION

If we become aware of a potential violation of our code or a law, we must report it, regardless of whether we work for Prayon or are an outside party.

Ideally, we should notify our immediate superior, their superior or our department manager. They will pass the information on to the right person. However, Prayon knows that this procedure can sometimes seem uncomfortable. If necessary, we can always contact our HR officer or the Legal Department or, if we wish to remain anonymous, we can also turn to the trade union delegations or the association of executives (ACP), who can contact HR and/or the Legal Department.

## SANCTIONS AND DISCIPLINARY MEASURES

Any member of staff who breaks the law exposes both themselves and the company to criminal sanctions (including fines and imprisonment) or civil lawsuits (damages or fines).

These measures also apply to supervisors who ignore violations or who fail to identify and/or rectify them, and to those who ignore the warnings they receive.

## PROHIBITION OF RETALIATION

Staff members who express a real concern will not be subject to retaliation, revenge or any form of harassment. Regardless of their level of seniority, members of staff are never permitted to exact retaliation or revenge or to harass a colleague who expresses a concern in good faith. Managers can in no way discourage a member of staff from reporting a concern or complaint via the appropriate channels, including via HR management, the Legal Department or trade union delegations.

Any member of staff who believes themselves to be a victim of any form of retaliation can and should report it via the set procedure.

## SANCTIONS FOR REPORTS MADE IN BAD FAITH

The guarantee provided in the section above does not cover those who act in bad faith with the sole purpose of disseminating false information or harming people.

# OUR (PROFESSIONAL) ETHICAL PRINCIPLES

## OUR COMMITMENTS TO EACH OTHER

### MUTUAL RESPECT

We must respect each other as individuals in our own right and treat each other with dignity. We must take into account people's differences in the spirit of integration - everyone is welcome and everyone is given a chance to express their potential.

By treating each other with respect, dignity, courtesy and fairness, we help to secure the success of all our working relationships.

### FAIRNESS AND DIVERSITY

We believe in the value of difference, seeing it as a key asset for Prayon. The diverse backgrounds of our staff encourage creativity and help us to better understand our customers. We promote initiatives that foster all aspects of diversity within our teams: gender equality, diversity of social and ethnic origins, opportunities for young and older people, the integration of people with disabilities.

Every one of us must:

- **never** discriminate, especially based on (the list below is provided for information only and is not exhaustive):
  - gender;
  - disability;
  - family situation;
  - sexual preferences;
  - age;
  - political or philosophical opinions;
  - religious beliefs;
  - trade union activity;
  - racial, social, cultural or national background;
  - food or other preferences.

This applies both at the time of hiring and in decisions concerning training, promotions, continued employment and working conditions in general.

- **support** and **promote** Prayon's commitment to diversity;
- **ensure** that our suppliers, customers and business partners are familiar with Prayon's diversity policy.

If we become aware of, witness or believe ourselves to be the victim of discrimination or harassment, we are encouraged to notify our immediate superior or our HR officer, the Legal Department, the superior of our immediate superior, our department manager or a staff representative.

## PRIVACY AND DATA CONFIDENTIALITY

Mutual respect also means respecting and protecting information about personnel, (temporary) employees, customers, suppliers and partners. This is particularly important with regard to ID numbers, personal addresses, telephone numbers, personal medical information and other data. These data must remain confidential and only be used for legitimate purposes (primarily commercial and/or administrative purposes).

We recognise the need to protect privacy and we strive to manage personal data responsibly and in accordance with the law.

We understand the need to keep data confidential and only use them for legitimate purposes. Our Group respects the workplaces of its employees, especially their email and voicemail.



However, the Group has certain rights when it comes to monitoring the ethical behaviour of its staff. Such rights include, in line with the applicable local regulations, access to and verification of items such as computer files, voicemail, business documents, offices, changing rooms and other Group property.

If we are authorised to access the personal data of our colleagues and/or customers and suppliers, we must:

- only **disseminate** such information within Prayon to those authorised to receive it and only to the extent necessary;
- **never** disseminate such information to anyone outside Prayon, unless there is a legitimate need or the employee has given us their consent;
- **ensure** that this information is kept safe;
- **not keep** this information longer than required for the legal or professional purpose for which it was acquired;
- **seek** advice before transferring personal data outside their country of origin.

Every one of us must:

- **refrain** from accessing or storing colleagues' personal data, unless we have the necessary authorisation and require said data for the Company's activities;
- **respect** our colleagues' privacy.

### USE OF ILLICIT SUBSTANCES

Prayon is committed to providing a healthy, drug-free working environment. The possession or use of a potentially dangerous substance (other than those on prescription) is strictly prohibited in the workplace. Problems caused by the consumption of drugs or alcohol will not be tolerated (see the Working Regulations for the sanctions in place). Any member of staff undergoing medical treatment that may interfere with their professional responsibilities must consult their GP for advice.

Any member of staff who handles substances posing a risk of misuse or abuse must respect Prayon's policies and local regulations concerning the handling and storage of these substances in order to prevent any illicit use.

### PSYCHOLOGICAL AND SEXUAL HARASSMENT

Prayon is committed to providing a harassment-free workplace. Prayon strongly disapproves of and does not tolerate colleagues' harassment of members of staff, suppliers or customers.



Prayon is also committed to providing a working environment that protects employees from harassment by third parties.

Harassment comprises any and all forms of verbal, physical and visual conduct that fosters an intimidating, offensive or hostile working environment, or one that hampers work. Forms of harassment include: racial slurs, sexist or racist jokes, offensive language, inappropriate posters or drawings, intimidation, inappropriate jokes or offensive writings sent by email or any other information system,

the use of any pornographic screenshots or media (including photos of naked people) or any other similar conduct. Sexual harassment consists of behaviour such as the solicitation of sexual favours, inappropriate sexual advances or any other verbal, visual or physical conduct with sexual connotations.

### VIOLENCE AND WEAPONS

Prayon is committed to offering a working environment that is free from threats, violence and physical intimidation.

Violence in the workplace comprises:

- physical, verbal or written threats;
- violent behaviour;
- behaviour that threatens the safety of the workplace.

We are encouraged to report anything that can reasonably be considered violent or threatening behaviour. If reporting this behaviour to our immediate superior makes us uneasy or if the behaviour is connected to an illegal activity or is suspected of being fraudulent, we can report it directly to our HR officer, the Legal Department or our trade union delegation.

Personnel, customers and suppliers are prohibited from carrying handguns, firearms or any other type of weapon on the Group's premises, regardless of whether they have a weapons permit.

### SOCIAL DIALOGUE

Prayon respects freedom of association around the world and encourages social dialogue, both individual and collective, within its subsidiaries. In addition to the established procedures in this regard, dialogue is one of our managerial values and Prayon engages in it as widely as possible.

Prayon respects employees' collective representation and trade union freedom. The Company urges its subsidiaries to hold voluntary negotiations of collective agreements and conventions with a view to establishing a sound social base.

Prayon encourages employees' individual expression, more specifically through the promotion of satisfaction survey-type tools. The Group also asks all those with managerial responsibilities to listen to their team, especially during the regular performance reviews.

### SAFETY, HEALTH, PROTECTION OF PHYSICAL INTEGRITY

All those working for or with Prayon are entitled to a safe, healthy and risk-free working environment. Prayon sets considerable store by the protection of people's physical integrity and health, as well as the prevention of all types of risk in their workplace. The Company will comply at all times with all laws in force in each country in which it is active. Prayon pursues a comprehensive policy intended to prevent occupational risks that is tailored to the activities of each site.

Prayon is clearly committed to informing staff of the company's rules and procedures regarding the prevention of occupational risks.

Every one of us must:

- **respect** the Company's rules on hygiene, health and safety in the workplace;
- **take** all reasonable precautions to maintain a safe and healthy workplace;
- **ensure** that our actions do not pose a risk to ourselves or others;
- **make** sure that we know what to do in an emergency at the workplace;
- **notify** our superiors of any conduct or situation that may jeopardise the safety of our working environment, and report any accidents, however minor.

## OUR COMMITMENTS TO OUR COMPANY

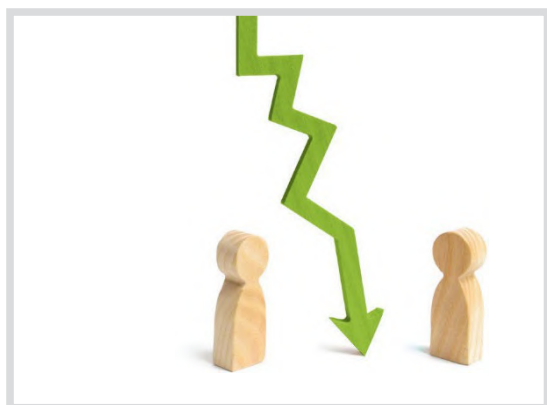
### CONFLICTS OF INTEREST

Conflicts of interest may undermine professional independence and objectivity, and unduly influence the way an individual fulfils the responsibilities entrusted to them.

Furthermore, once our stakeholders become aware of such conflicts of interest, this may greatly weaken their trust in us and Prayon's reputation.

As such, it is vital that we can identify situations that pose a risk of conflict of interest and, where possible, avoid them. If such conflicts of interest nevertheless arise, we must take the appropriate measures recommended in this code.

A conflict of interest is a situation in which an individual could prioritise their personal interests or those of people close to them (e.g. spouse, relative, business partner) to the detriment of the interests of certain customers or Prayon. An individual does not necessarily have to actually seek to prioritise their interests. The risk of such a situation occurring is enough to question their credibility and that of Prayon.



The appearance of a conflict of interest can be just as damaging, for us as well as Prayon, as a real conflict of interest.

There is an appearance of a conflict of interest when a relatively well-informed person may reasonably conclude that a conflict of interest exists, even if this is not the case.

There can also be potential conflicts of interest, meaning that it is reasonably likely that a conflict of interest will arise at some point in the future.

It is impossible to describe all situations that could be considered conflicts of interest. However, some general examples are listed below:

- Outside financial interests: A financial interest in a supplier or customer of Prayon.
- Gifts from customers: Receiving gifts from a customer, either before or after a transaction, may seem inappropriate. Our situation within Prayon and our relationship with this third party must be taken into account to determine whether there is a potential conflict (see the Gifts section below).
- Gifts from suppliers: Gifts of value accepted from suppliers often give rise to a conflict of interest. We can never accept goods of value for our own personal or professional use contrary to the guidelines contained in the Gifts section below.
- Outside employment: If we are employed by one of Prayon's competitors or suppliers or if our relationship could influence our obligations at Prayon in any way, we must immediately report this conflict of interest. The use of Prayon resources in any way with a view to facilitating outside employment is strictly prohibited.

Despite our best intentions, we may become involved in a conflict of interest, even involuntarily. It is therefore important to act completely transparently so that Prayon and, if necessary, the parties involved are notified as early as possible and that appropriate measures are taken in this regard.

If we believe ourselves to be in a real, apparent or potential conflict of interest, we must report it to our immediate superior without delay. This will be treated confidentially. Our immediate superior must quickly determine whether they believe there is a conflict or, in the case of an apparent conflict, a danger to Prayon's reputation. They must analyse the appropriate mitigation measures needed to resolve the conflict or mitigate its impact.

The immediate superior must then report the situation to the Legal Department, sharing their opinion on whether there is a conflict of interest and suggesting any mitigation measures. The Legal Department confirms whether there is a conflict of interest and decides how to handle the situation.

Arrangements will be made to rectify the situation in a way that is best suited to the interests of the customers involved, if applicable. The customer must be notified of the existence of any real conflict of interest and the mitigation measures taken to manage it. In other cases, arrangements will be made to rectify the situation in a way that is best suited to the interests of the Company and the member of staff. The immediate superior is responsible for implementing and monitoring this decision.

Potential measures may comprise:

- withdrawing from the procedure or situation in question;
- having restricted access to certain information;
- being transferred to a role or unit that eliminates such situations;
- divesting ourselves of the personal interests causing this conflict.

## CORRUPTION

Companies such as ours have a major role to play in the global effort to combat corruption. Corruption refers to the intention to act dishonestly or fraudulently, whether directly or indirectly, for personal gain. For example, someone in a position of power is remunerated illegally to make a decision favourable to the person who paid them. This is an act of corruption in which both parties are involved. Corruption increases business costs, fosters unfair competition, hampers innovation and weakens social structures. It also delays, distorts and diverts economic growth, and exacerbates poverty.

Corruption includes bribes, facilitation payments, influence peddling and the resulting money laundering. It can be disguised by otherwise legal activities, such as political contributions, charitable donations, sponsoring, gifts, hospitality, meals and tickets to events. It can also include advantages such as giving a job to a relative of the person that you are seeking to influence.

Prayon is firmly committed to conducting its activities free from any unfair influence of bribery and corruption. Prayon representatives may never directly or indirectly grant an inappropriate advantage or make any illicit payments. Prayon adopts a zero-tolerance policy on corruption.

None of us may ever:

- **make, suggest or promise** cash payments or services (including gifts and invitations) to civil servants, government officials, or persons able to influence them;
- **knowingly make** such payments through third parties. This assumes that we carefully select and closely monitor our subcontractors, agents and other business partners.

Furthermore, our partners must adhere to the same ethical standards as our employees.

### GIFTS AND BUSINESS ENTERTAINMENT

Still in keeping with Prayon's policy on conflicts of interest, it is crucial to have a gift policy that avoids any and all conflicts of interest and corruption.

At times, by way of thanks for their cooperation with Prayon, suppliers and/or customers may offer some tokens of their gratitude.

The following rules must be respected in such situations:

- Employees are required to refuse any gift containing alcohol or worth **more than €50** (or the equivalent in non-eurozone countries). There may be an exception to this rule in certain countries (such as China) where turning down a gift may be considered a cultural faux pas. In this case, we must notify our department manager, who will assess whether we can accept the gift in question as a one-off. If the department manager decides that we can accept the gift, they will specify whether we should hold a lottery for it within the department, donate it to a charity, or keep it.
- Invitations to sporting or cultural events or meals must be authorised by a senior manager (at least the department manager).
- Trips and sponsoring must always be approved by a manager (at least the department manager), who will verify the benefit for the Company.

Any gift, invitation to a sporting or cultural event, meal, trip or sponsoring offered by an employee on Prayon's behalf must be approved by a director in advance.

To recap, in line with the above section on conflicts of interest:

- The golden rule when receiving gifts or invitations: demonstrate total transparency.
- The golden rule when offering gifts or invitations: consider how this could be perceived publicly.

Prayon has established a code of conduct for suppliers, and asks each of our suppliers to sign this code to demonstrate their commitment to complying with said code. If a supplier fails to honour this commitment, Prayon staff are asked to contact the Purchasing Department, which will analyse the situation and take appropriate measures regarding the supplier in question.



### FINANCIAL REPORTING AND ACCOUNTING PRINCIPLES

Prayon's policy is to ensure that financial information is coherent, correct and wholly compliant with accounting principles.

We have established an internal control system that sets a standard for the integrity and exactness of our financial reporting procedures. We must strive to guarantee the accuracy, efficiency and integrity of Prayon's financial results.

All financial documents (more specifically contracts, invoices, inventories and other reports) must reflect reality. All transactions must be substantiated by sufficiently detailed documentation that reflects reality and must be systematically recorded in the proper accounting period.

We must also honestly record all information about our professional responsibilities, such as working hours and attendance, business expenses, production reports, research results and other projections. We must maintain all supporting documentation regarding financial transactions as per Prayon's rules.

We must never feel compelled to enter false or undocumented financial data. We cannot interfere in audits of Prayon's financial statements, nor influence them in any way. The intentional manipulation of financial data violates the Group's policy and the law, and is a fraudulent act. Any violation may result in dismissal and/or prosecution.

### MONEY LAUNDERING



**Prayon prohibits any and all involvement in money laundering operations.** Money laundering involves disguising the nature and origin of financial proceeds from criminal activities (such as corruption, terrorism or drug trafficking) with a view to presenting them as the result of a lawful enterprise, without it being possible to identify the actual source. The detection of any irregularity in the country of origin or financial institution involved in a transaction must be investigated and reported internally (more specifically to the Legal Department).

## DATA CONFIDENTIALITY AND THE USE OF PRAYON ASSETS

We have a responsibility to protect Prayon's assets as if they were our own. Prayon's assets are not limited to funds, property or equipment. They also include financial information (such as cost prices and strategic plans), technologies, commercial information about customers (such as sales statistics by volume, price or margin), the names of partner companies, information about suppliers (such as selling prices and contracts for raw materials), employees' personal data and other sensitive information (such as Group development projects that are not disclosed publicly or are disclosed in less detail). The theft, misappropriation or unauthorised use of one of these assets is a serious matter and will be treated as such.

We must strive to protect these assets. The personal use of these assets is permitted only with the Group's prior consent. They must never be used for personal purposes or for commercial purposes unrelated to our Group.

All information on the Group's companies must only be used for the benefit of these companies, and never for personal gain. In accordance with the legislation in force, this obligation continues even after the end of our professional, business or employment relationship.

Know-how and innovation are core components of Prayon's mission. Prayon's intellectual property is a very valuable corporate asset. We are obliged to respect and protect all intellectual property, whether it belongs to us or a third party.

These obligations also apply more specifically to all software applications. We will use all software legally and in accordance with the licences granted to us.

Prayon's reputation depends on each of us and our behaviour. We must ensure that we properly use all electronic media and communication systems, such as voicemail, email and commercial software.

Information contained in and exchanged on these systems is considered a professional record. Prayon can limit access to and use of these systems. In accordance with the applicable legal provisions, every Group company may also be required to access and disclose the content of these records.

As users of these systems, we must ensure that communication over these systems does not hurt or offend anyone, nor jeopardise our Group. We must never use Prayon's systems to deliberately, carelessly or maliciously send, store, transmit, download or distribute any threatening, abusive, defamatory or obscene content of any nature.

In real terms, every one of us must:

- **limit** disclosure of confidential information to those who legitimately need said information in the Company's interest;
- **securely** store all confidential customer and supplier data, both in paper and electronic format;
- **protect** access to the location of these data (locked offices/desks/cabinets/computers) when we are not present and if there is no surveillance;
- **prevent** any disclosure of confidential information to those outside Prayon (including employees' relatives);
- **avoid** discussing or working on confidential information in public areas where conversations can be overheard and data security compromised;
- **never disclose** confidential information about a previous employer;
- **return** all confidential information (including all copies) should we leave Prayon;
- generally **avoid** any personal use of the Company's resources (personal use of communication tools such as email, telephones and the Internet can be tolerated so long as it is limited, does not incur unreasonable costs and does not interfere with our work);



- **preserve and protect** the Company's resources, prevent them from being lost, damaged, misused, wasted, loaned, transferred or given away without authorisation;
- **avoid** any inappropriate use of information systems, email and the Internet;
- **keep in mind** that all of the Company's assets and documents belong to Prayon.

## POLITICAL NEUTRALITY

Prayon respects every employee's right to get involved in politics. Such involvement is strictly personal and must never make reference to Prayon or its brands. The Group is politically neutral.

We do not make any form of contribution to a political party or organisation, even where permitted by law.

Any member of staff who is involved in a political activity must do so outside their working hours, without mentioning their connection to Prayon or using the company's resources.

## RESPECT FOR FAIR COMPETITION

We strictly adhere to the rules and laws on competition in all countries in which we are active. They guarantee the independence of market players as well as open and fair competition in the interests of consumers and the companies themselves. Any offence is punishable by serious sanctions or even criminal convictions for the company and the employee involved.

We prohibit any exchange of confidential information as well as any agreement, whether formal or informal, or attempted agreement with competitors intended to set prices or conditions of sale, share a market or boycott a market player made during, for instance, meetings of professional associations or organisations.

We do not in any way fix the selling prices of our products sold by our distributors.

We refrain from abusing a dominant position or monopoly. We must only acquire or maintain a dominant position through legitimate, recognised means such as a patent, skill, superior know-how or geographical location.

Competitive information: Though it is common and acceptable to gather information about a competitor, it is strictly prohibited by competition law and trade law in general to amass information on competitors through illegal or unfair means (e.g. theft, the collection of information from new hires who had previously worked for a competitor). Furthermore, no confidential information belonging to a third party may be obtained or retained without the express permission of said third party (more specifically through the conclusion of a confidentiality or non-disclosure agreement).

False advertising: It is illegal to exploit the comparison between Prayon's products and similar competing products in a promotional or advertising campaign if said comparison is not based on objective data or studies.

## EXTERNAL COMMUNICATION

To guarantee consistency with regard to Prayon's image and message disseminated to the general public, every member of staff who is required to make **a speech** to a third party or **organise** a tour of our facilities for third parties (e.g. authorities, group of customers, suppliers or students) must notify their immediate superior as well as the Communications Department in advance and use as a support the information provided in the Corporate PowerPoint presentation on the intranet.

**The Prayon spokesperson is the only person authorised to handle contact with the press.**

**Should we be contacted by a journalist, we must direct them to the Prayon spokesperson.**

**If we want to contact the press, we are also asked to go through the Prayon spokesperson.**