



Code of Conduct and Good Practices

Approved by the Senior Management on 6th January 2025

Scope of application

The Solinest Group Code of Conduct and Good Practices applies to:

- Each of the entities in the Solinest Group, currently Solinest France, Solinest Belgilux, Solinest Germany, Nature Shift, Nature Innovation France, Nature Innovation International, VaiVai, Laboratoire Food et Nutrition, Triomphe Snat;
- All employees;
- For all their activities, whether within the group and between its members or with third party stakeholders (subcontractors and suppliers).

Furthermore, the Solinest Group wishes to work with partners who share its values. The effective application by its partners of the principles and rules set out in the Code of Conduct and Good Practices is therefore an element that should guide the choice to initiate and pursue any business relationship.

Changes in legislation, regulations and social and environmental issues mean that this Code of Conduct and Good Practices may regularly be updated.

The key principles of our Code of Conduct and Good Practices:

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1. Aiming for excellence

The Solinest Group is committed to meeting the deadlines and targets agreed with its customers, demonstrating diligence and professionalism in all tasks undertaken.

All Solinest Group employees strive for excellence in the performance of their duties and responsibilities. This commitment implies rigorous and conscientious execution of their tasks, in compliance with the Group's quality and performance standards, as well as an active contribution to the continuous improvement of work processes. Employees also interact effectively and harmoniously with other team members, fostering a positive and productive working environment.

To maintain a high level of qualifications and expertise, the Solinest Group encourages its employees to take part in training and skills development programs.

2. Complying with laws and regulations, and taking international standards into account

All employees of the Solinest Group are required to comply with national laws and regulations. Where the legislation of a country is even stricter than an ethical rule stipulated in this Code, the national legislation shall prevail.

The Solinest Group places particular importance on compliance with:

- Principles enshrined in the Universal Declaration of Human Rights;
- Fundamental conventions of International Labour Organization (ILO);
- Anti-corruption laws .

3. Protecting consumers

3.1 Product quality, traceability, and safety

The Solinest Group guarantees the quality, traceability, and safety of the products it sells. It therefore undertakes to comply strict standards in this respect, and to never leaving an alert on these subjects unanswered, regardless of its origin or nature. This responsibility applies both to products and to any promotional items associated with them (gifts, premiums, etc.).

3.2 Consumer information

The Solinest Group is committed to providing consumers with information on the composition of the products it sells, in compliance with local regulations. Depending on the country and changes in legislation, this information may be supplemented by information on the environmental and social performance of products. In addition, the Group may decide to supplement this information with more precise or educational data via other media (on or off pack, such as promotional materials, websites, etc.).

3.3 Data protection

The Solinest Group complies with the laws and regulations applicable to the protection of personal data and the privacy of consumers, particularly when their details are collected as part of a commercial prospecting campaign. To this end, the Solinest Group informs consumers of the methods and purposes of processing their personal data and implements the procedures necessary for them to exercise their rights.

The Group ensures that its business partners, in particular suppliers and subcontractors, are bound by appropriate contractual provisions and comply with applicable laws and regulations.

The Group also ensures that the processing of personal data relating to its employees, agents, service providers, trainees and job applicants complies with the aforementioned applicable laws and regulations and encourages its employees to take part in training and awareness-raising initiatives on best practices relating to the protection of personal data, respect for privacy and IT security. With regard to its tools, products, services and software, the Group ensures compliance with the principles of "*privacy by design*" and "*privacy by default*".

The Solinest Group provides data subjects with information on the processing of their personal data in the form of a charter, a confidentiality policy or any other easily accessible written medium.

The Solinest Group implements appropriate technical and organizational measures to guarantee a level of personal data security that complies with the state of the art and is adapted to the risks, taking into account their degree of probability and seriousness. In the event of a suspected or actual data breach, the Solinest Group has a procedure for alerting and informing the persons concerned and the competent authorities.

3.4 Responsible communication

For Solinest, consumer protection extends to the communications by the company and its brands (advertising campaigns, promotions, etc.). In addition to applicable regulations, the Group may draw on reference standards or best practices. The Group is committed to communicate clearly and accurately with consumers about the products and services they purchase, in particular to avoid any claims that could mislead them.

4. Protecting the environment

4.1 Taking environmental risks into account

The Solinest Group takes into account environmental risks and risks related to global warming and the destruction of biodiversity. In addition, the Group implements measures to prevent the risks to its employees that environmental and climatic factors could entail, particularly during exceptional climatic or environmental events. Each employee is encouraged to anticipate these risks and to share any information that could help limit their impact.

4.2 Reducing environmental impact

The Solinest Group is sensitive to environmental challenges, particularly in terms of land use, respect for biodiversity, waste management and pollution of water, air and soil, as well as the rational use of energy, and has put in place a process of continuous improvement of its environmental and energy performance, to which each employee is called upon to contribute through his or her professional practices and behaviour within the company.

4.3 Partner selection

It is the Group's policy to meet or exceed locally applicable environmental legal requirements. Wherever possible, and in addition to other criteria such as quality and price, Group employees are encouraged to give preference to suppliers and subcontractors offering the most environmentally efficient products or services. Solinest Group partners (subcontractors, suppliers, service providers, etc.) are invited to sign the quality charters drawn up by the Group and to adhere to the principles of this Code of Conduct and Good Practices.

5. Protecting employees' fundamental rights

The Solinest Group respects and ensures the respect for fundamental rights at work, as set out in the conventions regularly adopted by the International Labour Organization. In this context, the Group reiterates its commitment to the following fundamental rights:

5.1 Prohibition of child labour

The Solinest Group will not accept child labour under any circumstances, which is defined by the International Labour Organization as all activities that deprive children of their childhood, potential and dignity, and harm their schooling, health, and physical and mental development. The Solinest Group abides by the principle of prohibiting the employment of children, in compliance with national and international regulations governing the minimum age for admission to employment.

5.2 Prohibition of forced labour

The Solinest Group reaffirms its commitment to the fight against forced labour, i.e. any work or service exacted from an individual under the threat of any penalty and for which the said individual has not voluntarily consented.

5.3 Occupational Health and Safety

A safe and healthy workplace is a principle and a fundamental right at work.

The Solinest Group is committed to maintaining working conditions that ensure the safety and protect the physical and mental health of all employees of Group companies. In this context, the Solinest Group promotes and deploys a range of varied, consistent and appropriate measures to ensure hygiene, health and safety at work, in strict compliance with the national regulations governing these subjects, through prevention and information initiatives in which employees are required to participate.

Any form of sexual or moral harassment is prohibited.

5.4 Diversity, equal opportunity and inclusion

Within the scope of its activities, the Solinest Group strives to promote equal opportunities, i.e. to ensure that all employees have the same opportunities, regardless of their gender, origin, sexual orientation or disability.

The Solinest Group reiterates its commitment to the fight against discrimination in the workplace: all decisions relating to recruitment, promotion, retention, training, development, and remuneration must be based on the aptitudes, skills and experience required to do the job.

However, the principle of non-discrimination does not preclude differences in treatment when they meet an essential occupational requirement, and provided that the objective is legitimate, and the requirement is proportionate.

5.5 Freedom of association and the right to collective bargaining

Freedom of association and the right to collective bargaining are fundamental human rights at work, inseparable from democracy. They underpin civil liberties and provide protection against discrimination, interference, and harassment. They also play an essential role in efforts to achieve sustainable economic and social development. Within this framework, the Solinest Group respects the right of its employees form and/or join the trade union organizations of their choice, in compliance with national rules regulating these aspects. The Solinest Group also respects the right of employees to be represented by their trade union(s) and/or staff representatives in collective bargaining relating to the employment relationship, in accordance with national rules governing collective labor relations.

5.6 Freedom political affiliation

The Solinest Group respects the freedom of its employees to participate in political and civic life as part of their personal lives. Nevertheless, the Solinest Group does not grant any contribution in cash or in kind to its employees for their personal political activities, nor more generally to political organizations, parties or personalities.

6. Preventing conflicts of interest, fraud and corruption

6.1 Preventing conflicts of interest

The Solinest Group is particularly vigilant when it comes to preventing conflicts of interest, i.e. situations of interference between the position held within the Group and personal interests likely to influence the independent, impartial and objective exercise of the position held within the Group. In order to prevent the risk of conflicts of interest, Group employees are required to :

- Refrain from personal relationships that would contravene their professional duties and/or place them in a conflict of interest situation;
- Declare any conflicts of interest they may have to their line manager;
- Ensure that their actions and decisions are not influenced by interests that might reasonably appear to conflict with those of the Group.

6.2 Preventing fraud

Fraud is defined as intentional deception and/or concealment with the aim of appropriating, misappropriating, falsifying, or concealing money, goods, data or information belonging to the Group

and/or its partners, customers, suppliers, etc.

In order to protect the interests of Solinest and its employees, the Group will act with the utmost firmness against any perpetrator of fraud. In this context, employees are required to ensure strict compliance with the fraud prevention and detection measures implemented by the Group's various entities, and to report any incident to their superiors.

6.3 Preventing corruption

All Solinest Group employees are required to deal fairly with customers, partners, suppliers, etc.... and to make their choices according to objective criteria.

Any act of corruption, i.e. :

- The act of proposing or consenting to, at any time, directly or indirectly, offers, promises, gifts, presents or advantages of any kind, for themselves or for another, so that they performs or refrains from performing an act of their function;
- The act of soliciting or accepting, without authorization, at any time, directly or indirectly, offers, promises, gifts, presents or advantages of any kind for oneself or for another, in order to carry out or refrain from carrying out an act related to or facilitated by one's position.

Employees who feel pressured and/or solicited by third parties must inform their superiors.

Any gifts offered to customers, partners and suppliers, etc.... must remain limited in value and comply with the applicable regulations of the countries in which they operate.

To avoid any misunderstandings, Solinest Group employees should seek advice on the appropriate course of action.

7. Promoting fair competition and commercial relations

The Solinest Group is committed to respecting competition and fair trading.

The Solinest Group ensures compliance with national and international laws and regulations governing competition and business practices in the countries where it operates, with the aim enabling markets for goods and services to operate competitively, efficiently and unhindered.

Compliance with these rules by all Solinest Group employees is essential.

In this context, the following behaviours in particular are prohibited:

- Discussions or exchanges of sensitive and/or confidential commercial information by the Solinest Group with competitors,
- Agreements (oral, written, explicit or implicit) with competitors whose purpose or effect is to:
 - Artificially determine prices,
 - Allocate geographic markets or product markets, or sources supply,
 - Restrict or control competitors' production, outlets, technical development, or investments,
 - To boycott a competitor, drive it out of the market or prevent it from entering the market.
- Agreements with competitors aimed at artificially winning a contract in the context a public or private call for tenders.

Vigilance should also be exercised in relation to agreements with customers and suppliers, which may raise competition concerns.

8. Preserving the confidentiality of information

Solinest Group employees are bound by a strict obligation of confidentiality and discretion regarding information relating to Solinest Group activities to which they have access in the course and scope of their duties.

These obligations are governed by employment contracts and/or internal rules specific to each Solinest Group company.

9. Compliance with accounting standards

The Solinest Group's accounting records must be an accurate, fair and timely reflection of its transactions. Accounting books and records are kept in accordance with the relevant rules and regulations to ensure the accuracy of the accounts. This implies the accurate recording of all operations and/or transactions.