

The background of the entire page is a photograph of four people—two men and two women—standing in a modern industrial or laboratory environment. They are all smiling and looking towards the camera. The man in the center is wearing a white short-sleeved button-down shirt and has sunglasses on his head. The woman on the far right is wearing a white lab coat. The background shows a multi-level building with metal railings and large windows.

# Code of conduct SEPPIC Group Guidelines



Beyond complying with laws and regulations that apply to everyone, SEPPIC commits to conducting its business adhering to a number of principles stated here in a "Code of Conduct."

These rules and practices including the protection of information, are designed to protect the company and its employees. They concern the respect for individuals, environment, laws and SEPPIC's activities.

They are all pre-requisites for sustainable and responsible growth.

I thank you for ensuring their implementation.

**Jean-Baptiste Dellon**  
President – SEPPIC Group

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# Introduction

This document aims to describe certain rules of conduct applicable to all employees of SEPPIC, within the framework of their professional activity.

SEPPIC reminds each and everyone of its employees that they must apply, within the limits of their duties and responsibilities, to the legal and regulatory texts, particularly those explained in this document. Each employee must also ensure that these rules are also applied to by people who fall under its responsibility.

## 1. Respect for laws and regulations

The Group upholds the highest standards in how it runs its activities, notably by respecting human rights, labor laws and the environment. In professional activities, each SEPPIC employee must demonstrate integrity and abide by applicable laws and regulations under all circumstances.

## 2. Respect for people

### Safety and health in the workplace

Safety of employees is one of the Group's priorities, and efficiency must never be sought to the detriment of safety. Each employee has the right to work under safe and healthy conditions, and the duty to contribute to them by responsible behavior. Safety policy extends to all employees, subcontractors and service providers.

Each employee must exercise their professional activity in abiding by the safety, hygiene and health rules applicable in his or her workplace and participating in appropriate training sessions that might be planned in these areas.

### Prevention of discriminatory actions

The Group is determined to offer personnel equal opportunities for recognition and career advancement, whatever their origins, gender, beliefs or physical condition and will not tolerate any form of discrimination, or harassment.

### Respect for third parties

Each employee must help respect commitments made with SEPPIC partners, in particular, customers, suppliers and public authorities, and must also demonstrate objectivity and fairness in their treatment.

### 3. Respect for the environment

Respect for the environment and the preservation of natural resources in its operations and those of its customers is a major priority of SEPPIC. It is up to each employee, within his or her functions, to support these efforts and commitments by respecting the applicable regulations and as well as Group procedures concerning the protection of the environment.

## 4. Respect for competition law regulations

Competition law is applicable to every aspect of a company's commercial activity:

- negotiations with customers and suppliers,
- contacts with competitors,
- marketing and sales promotion.

The following, in particular, are prohibited:

- any agreement or even discussion with competitors concerning price-setting or other transaction conditions,
- production capacity,
- commercial organization and client coverage.

It is up to each SEPPIC employee to respect the competition law as violating rules can cause the company, its employees and its shareholders to incur serious risks. The law stipulates penalties that can be very significant for private individuals or extremely damaging to legal entities and may seriously undermine a company's reputation.

## 5. Respect for rules on insider trading

Any employee with information that, if made public, could influence the Stock Exchange price of the AIR LIQUIDE share must keep this information confidential and must not undertake, or recommend that a third party undertake or have undertaken, any operations on AIR LIQUIDE shares.

## 6. Prevention of conflicts of interest

Links to a competitor, customer or supplier

Any employee who could potentially be in a conflict of interest is encouraged to inform his or her immediate supervisor, HR Director or AIR LIQUIDE Ethic Responsible, of this situation.

Each employee must commit to avoiding any situation that involves a conflict between their personal interests and those of SEPPIC. For example, a case where an employee may work simultaneously for a customer, supplier or competitor or holds a major interest in these latter, either directly or indirectly.

## Respect for rules on corruption

It is prohibited to pay for, offer or grant unwarranted advantages, in any form whatsoever, directly or through an intermediary, to a private party or a representative of the public authorities in any country, with the purpose of obtaining favorable treatment or influencing the outcome of a negotiation in which SEPPIC is involved.

## Payments, gifts and advantages

No employee may accept from a competitor, customer or supplier of SEPPIC or offer to these latter any illegal/inappropriate payment, or gifts or other types of advantages. An exception can be recognized for gifts or invitations of low value that are not paid in cash and are in keeping with current commercial practices and do not violate any laws or regulations.

# 7. Protection of SEPPIC activities

## Protection of information

Each employee must properly protect and maintain confidential any strategic, financial, technical or commercial data or documents that are not public and whose disclosure to third parties could be harmful to the interests of SEPPIC.

Likewise, information concerning a named person, both professional and involving private life, is confidential and must be subject to all the precautions needed to prevent inaccurate or inappropriate modification or disclosure.

The duty to maintain confidentiality also applies to information provided by SEPPIC's partners and customers. It is up to each SEPPIC employee to respect these rules on the protection of information.

This duty on confidentiality continues even after the departure of an SEPPIC employee.

## Protection of property and resources

Each employee is responsible for the proper use and protection of Group property and resources such as intellectual property rights, installations, equipment and financial resources or cash. These resources and property must be used in accordance with their professional purpose and in the established framework.

They may not be used for personal ends except if explicit authorization has been granted by a duly authorized individual in the framework of established procedures.

Lastly, it is the responsibility of each employee to protect the property and resources of the Group against any damage, inappropriate alteration, fraud, loss or theft.

## 8. Transparency and integrity of information

SEPPIC strives for the greatest transparency and the highest standards of integrity and reliability of the financial, accounting and management information that is treated or communicated. Each employee who takes part in the production, analysis, filing or communication of this information must carry out these operations honestly and transparently.