

# 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

The exchange of gifts or invitations can contribute to mutual understanding and improve business relations but can also generate conflicts between personal interests and professional obligations.

When you receive gifts or invitations, the golden rule is total transparency. When giving away gifts or invitations, the golden rule is to stay within reasonable bounds and question how this might be perceived publicly.

Each of us must :

- Refuse gifts or invitations from suppliers, unless they are, clearly, only a symbolic amount
- Refuse to receive or give cash gifts
- Ensure that the gifts and invitations we offer are appropriate and in keeping with the values of DOURDIN Group
- Ensure, when establishing a new business relationship, that the parties are informed of the DOURDIN Group's gift and invitation practices.
- In the same way, we must inform ourselves about the policy of our new partner in this field. This should greatly help to avoid any misunderstandings.
- Immediately inform his superiors of any gift or invitation he receives.

Corruption is unacceptable and is not compatible with the DOURDIN Group policy. It does not benefit the communities in which we operate and represents a cost to the company. Bribery is a form of corruption and is illegal in most countries, especially when officials are involved.

Each of us must :



- Never make, offer or promise cash payments or services (including gifts and invitations) to government officials, or those who can influence them.
- Never knowingly make such payments through third parties. This assumes that we carefully select and closely follow our subcontractors, agents and other business partners.

#### **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**

DOURDIN is fully committed to respect the best practices.

#### **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.