



CODE OF BUSINESS CONDUCT

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INTRODUCTION

Our Code of Business Conduct (the “Code”) serves as the backbone for guiding our employees as they conduct their professional activities. Our Code is intended to formalize our commitments toward our major internal and external stakeholders, along with the ethical principles that must guide the actions and behavior of all Winoa employees. It applies to Elastikos (France), Winoa, and all their majority-owned domestic and foreign subsidiaries (collectively referred to as “Winoa”).

All Winoa directors, officers, employees (collectively “employees”) shall act with integrity and comply with the Code and all applicable laws and regulations, rules, or standards, as well as with all Winoa policies, procedures and business practices. We also expect that those who perform internal duties for Winoa, have access to internal systems or required to follow Winoa procedures, although they are not employees, including independent contractors, consultants, business partners and anyone working on behalf of Winoa, will embrace the spirit of the Code and adhere to its standards.

Officers, directors, and managers are held to an even higher level of accountability for ethical behavior. They are expected to lead by example and set a tone that reinforces the importance of compliance and ethical business conduct.

For more information
[Compliance Charter](#)

We strongly encourage you to speak up if you have questions about this Code or any other Winoa policy, or concerns about real or potential illegal or unethical business conduct. We understand speaking up may make you feel uncomfortable, but the earlier you raise questions or concerns, the sooner we can resolve them before any harm is done. There are various resources within Winoa to assist and guide you: you can contact the Chief Compliance Officer, Human Resources Department, Legal Department or a manager in your division.

We are committed to maintain a work environment where you can ask questions, voice concerns, and make appropriate suggestions without fear of retaliation. This means that no one in Winoa can penalize you in any way:

- if you raise in good faith a concern about a potential illegal or unethical conduct or a violation of the Code or of a Winoa policy or,
- if you assist in the resolution of an investigation or proceeding.

Violations of the Code may result in discipline by Winoa, including reprimand, suspension or termination according to applicable local rules and procedures. Winoa may also report violations of the Code to the appropriate supervisory, regulatory or law enforcement authorities.

WE VALUE HUMAN BEING AND ENVIRONMENT

PROVIDING A SAFE AND HEALTHY WORKPLACE

We are committed to provide a safe and healthy workplace for employees, contractors and communities. Our health and safety motto is that every person will go home safe and healthy every day.

For more information
[Health and Safety Policy](#)

We will comply with all applicable regulatory requirements as a minimum, and implement programs and processes to achieve greater protection, where appropriate. We expect all employees and directors to participate by acting in a responsible manner, to respect safety rules, to report potential safety hazards and issues, and to be involved in implementing solutions.

RESPECTING PEOPLE'S AND CHILDREN'S RIGHTS

Wherever we operate we are committed to complying with all applicable labor and employment laws and regulations, including laws relating to equal employment opportunity, non-discrimination, as well as laws prohibiting trafficking in persons and forced or compulsory labor and child labor.

We believe in freedom of association and support the effective recognition of the right to collective bargaining, in the countries where it is applicable.

TREATING OTHERS RESPECTFULLY AND ENCOURAGING DIVERSITY

We believe in dealing respectfully and fairly with colleagues and employees and in doing our utmost to create a motivating work environment that supports honesty, integrity, respect, and trust, fostering the development of employee potential. Also as a worldwide group, we value and encourage diversity.

We do not tolerate discrimination, intimidation or harassment at the workplace, including any kind of verbal, physical or sexual harassment or abuse, uncivil treatment, corporal punishment, mental or physical coercion, or verbal abuse of employees. In particular, we expect from our employees to:

- Act professionally in all interactions – including conversations, meetings, email communications and online exchanges;
- Create an inclusive, equal opportunity work environment that values the opinions of others;
- Engage others positively, with no belittling or bullying behaviors;
- Never discriminate based on gender or sexual orientation, physical attributes or condition (including disability and pregnancy), age, nationality, social or ethnic background, religious beliefs (or absence of such beliefs), or political alignment;
- Base employment decisions on the individual's qualifications, skills and performance – not on personal characteristics or protected status;
- Avoid sexually explicit discussions, jokes, and material while at work or using company resources;
- Be careful not to harass others, even without intending to. Joking, teasing and commenting about sensitive subjects can offend others and create uncomfortable working conditions. In particular, any sexual/physical or psychological harassment, bullying or other such conduct that interferes with an

individual's work performance or creates an intimidating, hostile or offensive work environment, is totally forbidden;

- Speak up if you witness or experience harassing, discriminatory or unfair behavior.

PROTECTING ENVIRONMENT

We strive to conserve natural resources and reduce the environmental burden of waste generation and emissions to the air, water and land.

We protect environment by complying with all applicable environmental laws, adhering to the requirements of all environmental permits and immediately reporting environmental accidents.

WE SAFEGUARD OUR COMPANY'S AND OUR PARTNERS' INFORMATION AND RESOURCES

PROTECTING COMPANY'S ASSETS

Employees are expected to protect Winoa's assets and use those assets only in the intended manner and for business related purposes, in particular employees are expected to:

- Treat company assets with care – including financial assets, intellectual property, data and information, and buildings and facilities – and use them only for business-related purposes;
- Engage expenses in a reasonable and prudent manner and with a legitimate business purpose;
- Follow all Information Technology safeguards when using company systems;
- Use Winoa technology assets for business related purposes; occasional personal use is permissible, subject to compliance with company policies.

For more information
[Travel & Entertainment Policy](#)
[IT Charter](#)

AVOIDING FRAUD

A fraud is any intentional or deliberate act to deprive Winoa or an external party with whom Winoa transacts, of anything of value by deception, or other unfair means. This includes internal fraud, when an employee obtains personal gain through the deliberate misuse or misapplication of Winoa's resources or assets.

Winoa employees must not knowingly commit, or be a party to, or be involved in, fraud.

AVOIDING CONFLICT OF INTEREST

There is a conflict of interest when the personal interests of an employee or his/her personal relationships unduly influence (or could be perceived to influence) his/her business judgment, decisions or actions taken in the course of his/her mission for Winoa.

For more information
[Anti-Corruption Policy](#)

At Winoa, business decisions must be governed by good judgment, objectivity and loyalty to Winoa. In such perspective, employees will avoid situations that could create or appear to create a conflict between their personal interests and the interests of Winoa.

SAFEGUARDING NON-PUBLIC INFORMATION

Employees must handle non-public information concerning Winoa or its business with care in order to avoid unauthorized disclosure, in particular, employees shall:

For more information
[IT Charter](#)

- Access non-public information only when authorized, and share non-public information internally only with those who are authorized to access it (because it is in connection with their duties);
- Not disclose non-public information to anyone outside the company, except when disclosure is required by law or appropriate legal process or in connection with an appropriate business purposes;
- Make sure that appropriate steps are taken to protect non-public information confidentiality (e.g., a nondisclosure agreement before disclosing it to a third party);
- Remember that the obligation to protect non-public information continues after employment with Winoa ends.

Non-public information includes all Winoa proprietary information such as contracts and pricing information, marketing plans, technical specifications, employee information...

PROTECTING PERSONAL DATA

We are committed to protecting the privacy and security of personal data relating to our employees, customers and others business partners, and to complying with all laws that regulate how we handle such information.

For more information
[IT Charter](#)
[Privacy Notice](#)

PROVIDING TRUTHFUL AND ACCURATE BUSINESS AND FINANCIAL RECORDS

Employees are responsible for the integrity of the documents and records under their control, in particular employees are expected to ensure Winoa business and financial records prepared under their control are truthful, complete, accurate, fair, and understandable given their intended use, in particular:

For more information
[Anti-Corruption Policy](#)

- Write clearly, professionally and accurately in all documents (e.g., emails, texts, memos, reports and financial statements quality reports, time sheets, travel expense reports...).
- Be complete and accurate when reporting assets, liabilities, revenues and expenses.
- Never intentionally falsify a financial record or misrepresent the facts of a transaction.

WE INTERACT WITH THIRD PARTIES WITH INTEGRITY

DEALING WITH GOVERNMENT OFFICIAL

The conduct of our business may require that we interact with officials of various governments around the world. Dealing with government officials is often different than dealing with private persons as many governmental bodies strictly prohibit the receipt of any gratuities by their employees, including meals and entertainment.

For more information
[Anti-Corruption Policy](#)

Additionally, the definition of a government official is very broad. It includes but is not limited to any official (whether elected or appointed), employee, agent or representative of any government entity, including departments, agencies, or instrumentalities of a government (including businesses that are state-owned or state-controlled), any political parties or candidate for a public office, or any officer or employee of a public international organization (such as United Nations or World Bank). A government official can work for a foreign or domestic government, and for national, state or local governments, departments, bodies or agencies.

Winoa employees shall not request, accept, make, offer to make, promise or authorize to make payments, or give anything of value, directly or indirectly, to or from any third party, including a government official, to assist Winoa in obtaining or retaining business or securing an improper advantage.

DEALING WITH CUSTOMERS AND SUPPLIERS

No employee shall accept from a customer or a supplier, or provide them final compensation, gifts or other benefits. Only gifts or benefits of low value, which are not paid in cash and consistent with commercial practice in force and Winoa Policies, and not contrary to law or regulation, can be accepted or offered.

For more information
[Anti-Corruption Policy](#)
[Travel & Entertainment Policy](#)

COMPETING FAIRLY

It is the responsibility of each employee to ensure that our efforts in the marketplace are conducted in accordance with the letter and spirit of applicable antitrust and competition laws. Most countries have introduced laws prohibiting competition practices, such as collusion, abuse of dominance, dumping etc.

For more information
[Anti-Trust & Competition Policy](#)

It is against the Group policy to have a discussion or communication with any competitor relating to price or any matter that affects pricing, including allocation of markets, geographies, customers or lines of business.

Any employee who receives notification from an authority in charge of competition in a country or a supranational organization must immediately inform the Group's Legal Department and Chief Compliance Officer.

Employees are encouraged to practice competitive intelligence through publicly available information or ethical and legal enquiries such as publicly available filings with government agencies, public speeches of company executives, annual reports or news press articles and publications.

RESPECTING EXPORT-CONTROL AND TRADE SANCTIONS REGULATIONS

All transactions, regardless if they are crossing borders or transferred within the same country, may be subject to trade and/or export control regulations. Countries and organizations such as United Nations around the world:

- have placed restrictions and controls on the export and re-export of strategic goods, software or technologies to/from specified countries, territories and end-users, and for particular end-uses, including military and weapon mass destruction;
- have imposed economic sanctions, trade embargoes and asset freezing provisions on certain countries, territories and their governments, entities and individuals.

For more information
[Trade Sanctions and
Export-Controls Policy](#)

These export-controls and trade sanctions help support governments' foreign policy objectives, including promoting national security interests, fighting terrorism, preventing proliferation of weapons of mass destruction, and advancing human rights.

As doing foreign trade business is a privilege, Winoa is committed to complying with all applicable export control and trade sanctions laws and regulations. Failure to do so may impact Winoa's reputation and could result in severe criminal and civil penalties and loss of export privileges being imposed on Winoa and/or its employees. All Winoa employees engaged in foreign trade activities must refrain from transactions recognized as not being permissible by the national or international export-control and trade sanctions regulations or the internal directive known as the Winoa Trade Sanctions and Export-Control Policy.

Employees must immediately notify the Chief Compliance Officer if they become aware of any Winoa-related business with a nexus to restricted geographies, which include Cuba, Iran, North Korea, Syria and the Crimea region.

INTERACTING WITH THE MEDIA AND OTHERS OUTSIDE WINOA

It is important that we provide reliable information to the public and others about our operations, positions, policies, practices, performance, and outlook. Only authorized persons may speak as representatives of Winoa and communicate with the public on behalf of Winoa.