

WE –BUSINESS PARTNERS CODE OF CONDUCT

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1 Message from Management

The Waga Energy Group is committed to operating in compliance with the laws and regulations applicable to its activity. In this way, Waga Energy strives to develop a responsible purchasing/commercial approach that is fully in line with its Corporate Social Responsibility approach. We expect the same commitment from our business partners, and wish to develop fair, lawful, ethical and sustainable business practices with them. Compliance with the principles set out in this code is an essential criterion for selecting and maintaining commercial relationships with our business partners.

Each business partner (supplier, buyer, any third party with whom Waga Energy does business) of the Waga Energy Group undertakes to respect the principles laid down in this code, to disseminate them within its organization to each of its employees, and to invite its own suppliers and subcontractors to comply with these requirements.

Below you will find the main principles of the Code of Conduct for Business Partners, which you must comply with when working with us.

2 Founding texts

This code is based on the Universal Declaration of Human Rights; the principles of the UN Global Compact; the general principles of the International Labor Organization; anti-corruption laws, in particular the Sapin II Act (2016) and the Foreign Corrupt Practices Act (1977); and the European General Data Protection Regulation (GDPR, 2016).

3 Principles to be observed

3.1 Business ethics

- **Conflicts of interest:** You must endeavor to prevent the occurrence of situations that could lead to a conflict of interest in the context of your commercial relationship with Waga Energy. You must declare any situation in which an interaction with a Waga Energy employee may conflict with the group's interests. Any potential or actual conflict of interest must be disclosed to Waga Energy as soon as you become aware of it.

- **Fight against bribery, corruption and influence peddling:** Waga Energy has implemented a zero-tolerance policy in the fight against corruption. Waga Energy does not accept any form of corruption or influence peddling on the part of its employees or business partners. We ask you to commit to strict compliance with national and international anti-corruption legislation when negotiating and executing contracts with Waga Energy. You must take the necessary measures to prevent, detect and punish any act of corruption or influence peddling. You must not offer, promise, give or accept, directly or indirectly, advantages that compromise or appear to compromise the ability to make fair and objective business decisions or in order to obtain an undue advantage (preferential treatment, signing of a contract, exemption from customs duties, obtaining of permits and in general anything that influences a person in the performance of his/her duties).

- **Gifts and invitations:** gifts and invitations of low value for no consideration are an acceptable practice in the context of business relationships when they are given in full transparency and in accordance with local laws and customs. Waga Energy has a policy governing the giving and receiving of gifts and invitations which prohibits gifts or invitations intended to obtain from the

recipient an undue favor in return for the benefit received, or which influence the recipient's decision in relation to you as a Business Partner.

- **Fight against money laundering and the financing of terrorism:** money laundering is a criminal activity that runs counter to all the values upheld by Waga Energy. You are therefore expected to take all appropriate measures to effectively combat money laundering. We ask for transparency in financial transactions and are vigilant with regard to any suspicious payment behavior. Waga Energy will not tolerate any fraudulent practices, such as falsification, duplicate invoicing or the recording of inaccurate accounts or documents.

- **Compliance with export control regulations and sanctions:** we ask you to undertake to comply with all applicable export control regulations, economic sanctions and trade embargoes of the Member States of the European Union, the United States of America and any other countries concerned.

- **Compliance with the rules applicable to competition law:** the principle of free competition and the prohibition of abuses in this area promote the development of healthy markets and ensure the protection of economic players. You must ensure strict compliance with applicable competitive standards. Unfair competition, unlawful agreements and abuse of a dominant position are strictly prohibited. In the course of your activities with Waga Energy, you must not participate in any illegal agreements (written or otherwise) or concerted practices that have the purpose or effect of restricting competition, particularly in interactions with your competitors (e.g. bid-rigging agreements), but also with other market participants at other levels of the supply chain. Nor should you adopt abusive unilateral behavior if you are in a dominant position.

- **Protection of personal data:** Waga Energy takes care to comply with standards for the protection of personal data. You must comply with the legal framework that governs the data processing you implement by complying with all standards applicable to you. You will process (e.g. collect, store, use and share) personal data only to the extent necessary for the purpose of your action and to the extent that applicable data protection requirements are complied with. Before sharing or transferring personal data, you will implement appropriate safeguards to ensure an adequate level of protection.

- **Intellectual property and confidentiality:** you must protect all rights relating to Waga Energy's intellectual property, as well as trade secrets and proprietary information exchanged during the negotiation, conclusion and performance of the contract with Waga Energy. You must also protect such information from unauthorized access, destruction, modification, use and disclosure, using appropriate technical and organizational measures, and only use confidential information for appropriate purposes.

3.2 Respect for the human person

At Waga Energy, respect for employees and for the human person is a cardinal value. The Waga Energy Group is convinced that the viability and dynamism of its activity depend to a large extent on the quality of life and work of its employees. Waga Energy expects its business partners to share this approach. Taking this value into consideration implies compliance with the following principles:

- **Principle of human dignity, health and safety:** you formally undertake to prohibit and punish any inhuman or degrading treatment. You help to create a working environment that complies with health and safety standards, is specific to your activity and production method, and is free from any form of harassment, violence or abuse. Human trafficking and modern slavery are strictly prohibited. It is your responsibility to ensure that each of your employees has the freedom to work and to leave his/her job with reasonable notice. Minors may only work as part of an educational

project, such as internships and apprenticeship contracts, in compliance with applicable local regulations. You undertake to comply with the applicable regulations on working hours and working conditions.

- **Principle of equality and rejection of all forms of discrimination:** Equality is a French constitutional value. You take care to exclude all forms of discrimination, both when hiring your employees and throughout their careers. As such, any form of discrimination based on gender, origin, religion, political affiliation, trade union membership, pregnancy, sexual orientation or sex life is strictly prohibited.

3.3 Respect for the environment and natural resources

Natural resources are essential to maintaining and developing economic activity. Respect for the environment in which companies operate is fundamental. Waga Energy requires all its business partners, without exception, to comply scrupulously with applicable national and international environmental standards throughout their supply chain. Waste and emissions into the air, water and soil generated by business partners must be properly treated and monitored in accordance with current regulations. In particular, hazardous waste and emissions must not be abandoned, released or dumped illegally. Waga Energy also recommends that its business partners be proactive in preserving a viable environment. It is up to them to anticipate the environmental risks associated with their activities, and to choose more sustainable raw materials, production methods and means of transport. In particular, this recommendation involves responsible behavior and the development of Corporate Social Responsibility on the part of business partners. Waga Energy may ask its business partners to carry out a product lifecycle analysis and an assessment of the carbon footprint of their activity.

4 Business partner commitment

You hereby acknowledge that you have received the Code and undertake that all your employees, subsidiaries and employees of your subsidiaries, current or future, dealing or likely to deal with one or more entities of the Waga Energy Group, will receive the Code and comply with all its terms.

You acknowledge that any failure to comply with one or more of the principles set out in the Code will constitute a breach of your essential obligations in the context of your commercial/business relationship with the Waga Energy Group, which may oblige the Group to terminate said commercial/business relationship and to inform the competent authorities where appropriate.

If, by any chance, you become aware of or witness any behavior on the part of one of your employees, or on the part of an employee of the Waga Energy Group, that is contrary to the principles set forth in the Code, you must inform the Waga Energy Group Compliance Department at the following address: compliance@waga-energy.com, so that all appropriate measures can be taken to stop the contrary behavior thus highlighted.

5 Control and audit

The Waga Energy Group reserves the right to monitor compliance with these principles and to conduct compliance audits at any time. In the event of any suspected non-compliance, we expect you to be open to communication and cooperative in providing the necessary information and access to Waga Energy Group representatives seeking to verify compliance with the requirements of this Code. You undertake to improve and correct any shortcomings detected. We

ask you to maintain sufficient records to prove compliance with this code of conduct. You must provide Waga Energy Group representatives with complete, authentic and accurate records. We also reserve the right to suspend or terminate the agreement with you in the event of unresolved non-compliance.

Company: _____

Name: _____

Position: _____

Date

