



ETHICS CHARTER



NOVEMBER 2024

THE ETHICAL CHARTER OF PORTMANN GROUP

A word from the CEO

The PORTMANN Group : expertise, values and ethics

The PORTMANN Group, renowned for its quality and reliability, has made its mark thanks to your personal and collective involvement.

Over and above the convictions and commitments that unite us, I would like to set out in this Code of Ethics the rules of conduct that apply to us, to you, to all employees.

This Charter is not just a reminder that our work and the performance of all our duties within the PORTMANN Group require strict compliance with the laws and regulations in force. It is also a statement of the principles of professional ethics that must inspire our behavior in all circumstances.

The fight against corruption is at the forefront of these principles.

Because the PORTMANN Group was built around strong values that shape our culture and determine our actions, I naturally invite all employees to be extremely vigilant in ensuring that this charter is properly applied.

I therefore ask each and every one of you to take ownership of these rules and principles of professional ethics, which must guide our behavior in all circumstances, and to remind our external partners of them on a regular basis.

PORTMANN, as an identified and recognized human, technical and cultural signature, will further strengthen the confidence of its private and public clients.

Jean Michel BAUER
Directeur Général

THE PORTMANN GROUP ETHICS CHARTER

“Commitment, boldness, flexibility for excellence based on trust” are the core values of the PORTMANN Group.

It is in a healthy and honest environment that these values will come into their own. By affirming these values of commitment, boldness and flexibility, this Code of Ethics sets out the framework for their expression, particularly with regard to our partners and stakeholders.

➤ **COMMITMENT**

The commitment of everyone, at every level and at every moment, to building lasting relationships with our customers and partners, and commitment as a factor in professional fulfilment. It implies the need to adopt the irreproachable attitude and behavior required to meet these commitments.

➤ **BOLDNESS**

The audacity to take on challenges, to think outside the box, to think bigger, to rely on a variety of profiles and personalities to innovate, build and move forward together; and the satisfaction of having dared. To ensure that this exercise is never a risk factor, PORTMANN Group employees undertake always to respect the limits set by the law and the terms of this charter.

➤ **FLEXIBILITY**

We are constantly striving to be flexible, adaptable and supportive, so that we can provide our customers with the best possible transparent service in a volatile and unstable world.

➤ **EXEMPLARITY IN TRUST**

Trust, respect and humanity are the historical foundations of our internal relations and our relations with our customer partners. It commits the PORTMANN Group to ensuring the well-being of its employees and the integrity of its managers in all circumstances.



**This Code of Ethics applies to all employees
of the PORTMANN Group**



Our Ethics Charter sets out the rules and standards for our entire Group. Every employee must read it and make it their own. We are all guarantors of the commitments set out in our Charter as we carry out our day-to-day duties. We must all be vigilant, sensible and conscientious in our actions, at all times.

Ethics is everyone's business: let's be vigilant and anticipate the potential risks inherent in our duties and responsibilities.

Ethics is everyone's business: we all have an obligation to anticipate the risks inherent in our duties and responsibilities.

When making decisions, this charter cannot cover all the situations that may arise, so we need to ask ourselves three questions:

- Is it legal? Is it in line with the values of the PORTMANN Group?
- Are the PORTMANN Group, the company, economic partners and/or stakeholders protected from any negative impact resulting from my decision?
- If my decision were made public, would I be able to stand by it?



If the answer to any of these questions is “no” and/or if there is the slightest doubt, the employee is invited to seek the advice of his or her line manager.

As a long-standing player and a passionate entrepreneur, and because we stand by the **excellence** of our expertise, our close relationship with our customers and our constant adaptation - the foundation of shared trust - we make the prevention of corruption and fraud a permanent commitment.



Bribery: this consists of offering, giving or promising an advantage in exchange for the performance (or failure to perform) of an act by a professional in breach of his or her obligations.

Influence peddling: this is when a person uses his or her position or influence, real or supposed, to influence a decision to be taken by a third party. Influence peddling thus involves three players:

- **The beneficiary:** the person who provides benefits or gifts
- **The intermediary:** the person who uses the credit he or she has because of his or her position
- **The target:** the person with decision-making power (public authority or administration, customs officer, magistrate, expert, etc.).

Employees are prohibited from engaging in any behavior that could be construed as corruption or influence peddling.

It is therefore essential for employees to distinguish between commercial practices that do not harm the image and integrity of the PORTMANN Group or that are not carried out to the detriment of the PORTMANN Group, and actions that could constitute an offence.

BY WAY OF EXAMPLE

Strictly forbidden behavior, in particular



- **Accepting a sum of money** in any form whatsoever that does not result from the performance of the contract.
- **Favoring one supplier** or sub-contractor over another in exchange for any consideration or advantage.
- **Agreeing to issue amendments of convenience** to a subcontractor or service provider during the course of a contract, in return for a gift, advantage or sum of money.

Employee protection

Employees of the PORTMANN Group who have questions about a situation of which they are aware and which is likely to contravene the ethical rules of the PORTMANN Group are encouraged to contact their direct or indirect hierarchical superiors, but may also contact the Ethics Officer directly.



Use of the whistleblowing procedure in good faith, even if the facts reported prove to be inaccurate or do not give rise to any legal proceedings, does not expose the person making the report to sanctions.

On the other hand, misuse of the whistleblowing procedure exposes its author to disciplinary sanctions, as well as legal proceedings



Our vision: to pursue our development by constantly striving for excellence and by resolutely adopting a socially and environmentally responsible approach that respects future generations.

Our mission: to provide the best possible service to our customers, by offering tailor-made supply chain solutions in France and Europe, while guaranteeing the safety of all concerned and complying with industry standards.

