

Ethics Charter

Ethics in everyday life

Papeteries du Léman



Our values



RESPECT

Respect is a guarantee of acceptance of people's diversity, of adaptation to different cultures, as well as rigour with regard to our rules and best practices.



LIVING TOGETHER

Taking care of one another is at the heart of how we operate. We strive to foster a culture of inclusion in which we care for one another, regardless of age, gender identity, race, sexual orientation, religion, physical or mental ability or ethnic origin. We encourage everyone to bring their own unique personality and point of view to work, and we expect everyone to accept, respect and value the unique perspectives and points of view of others. We are committed to providing an environment in which all employees feel safe, respected and in their place.



CUSTOMER SATISFACTION

A guarantee of our company's development, its sustainability and therefore its ability to meet its commitments to stakeholders, we mobilise all our resources and skills to ensure customer satisfaction.



SAFETY

We encourage team spirit and strive to provide our employees with conditions conducive to the performance of their duties and their professional development, in complete safety.



PRESERVING THE ENVIRONMENT

Our priority: to protect the environment by reducing the impact of our activities on natural resources and biodiversity.

Preamble

The Ethics Charter sets out the principles and values to which Papeteries du Léman adheres and which must guide every employee of the company in the day-to-day practice of their profession.

This Ethics Charter applies to all employees of the company (directors, managers, employees, etc.) as well as to all persons with whom the company is associated, such as its customers, suppliers, advisors, auditors, consultants, subcontractors, agents and other intermediaries representing Papeteries du Léman.

The principles defined in this Charter encourage Papeteries du Léman to conduct its business and carry out its work in such a way as to maintain and strengthen the trust of customers and stakeholders.

All employees, whatever their hierarchical level, must apply, within the limits of their duties and responsibilities, the rules set out below, which form part of the loyal and good faith performance of their employment contract or corporate office, and ensure that these rules are also applied within their team or by the people under their responsibility.

Employees who do not comply with the applicable laws or regulations, or with the principles of this Charter, may be subject to disciplinary measures in accordance with internal regulations and/or legal provisions.

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Corporate, social and environmental responsibility

Compliance with laws

Compliance with the law is an essential value. It is the responsibility of all employees to know and fully comply with all applicable laws and regulations, as well as the various policies and directives established by the Company in its various areas of activity.

All employees are required to inform themselves of the provisions in force within the Company relating to their area of responsibility, to comply with them and, in case of doubt or need, the competent services to obtain additional information and advice.

Respect for people

Human resources management, employee leadership and employee relations are based on the principles of mutual trust and respect, ensuring that everyone is treated with dignity.

All employees have the right to respect for their private lives, particularly with regard to regulations concerning computer data.

All employees must respect the safety, rights and opinions of their colleagues, as well as their cultural or specific characteristics.

Fight against discrimination and harassment

Papeteries du Léman aims to apply a human resources policy that is fair and complies with the law.

It guarantees its employees and stakeholders a working environment that excludes any discrimination on the grounds of gender, sexual orientation, ethnic origin or religion, employee representative status, trade union office, political opinion, disability, age or any other offensive physical, verbal or visual behaviour.

The Company is committed to ensuring that the professional environment is free from any harassment, and in particular any intimidation, sexual advances, threats or acts of violence.

It does not tolerate any form of harassment, violence or any act that would make the workplace threatening. This includes any attitude, situation or behaviour that could be qualified as harassment. Any breach of these rules may result in disciplinary sanctions.

Prohibition of child labour

Papeteries du Léman complies with national legislation and regulations on child labour.

In any event, it does not employ children under the age of 16 and complies with ILO provisions relating to the health, safety and morals of young people aged 15 to 18.

The Company ensures that its suppliers and partners subscribe to the same requirements.

Elimination of all forms of forced labour

Papeteries du Léman is committed to free choice of employment and the elimination of all forms of forced and compulsory labour.

The Company ensures that its suppliers and partners subscribe to the same requirements.





Respect for the environment

Papeteries du Léman strives to achieve the highest environmental standards in terms of conservation of natural resources, energy consumption, waste management and protection of biodiversity. The aim is to limit the pollution linked to its activity.

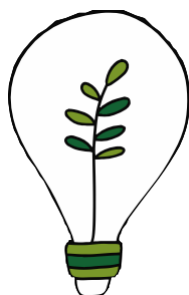
This necessarily implies compliance with the legal provisions in force regarding environmental protection.

In the course of their day-to-day activities, all Papeteries du Léman employees are made aware of and take responsibility for environmental protection, and more particularly in the following areas:

- Reducing waste and pollutants, conserving natural resources and recycling materials at every stage of the production cycle;
- Controlling energy consumption.

The Company undertakes to:

- Actively pursue a policy of developing and implementing technologies capable of reducing polluting emissions;
- Continuously assess the impact of its products and factory operations on the environment and the communities with which it comes into contact, with a view to continuous improvement.



Promotion of occupational health and safety

Papeteries du Léman guarantees adequate working conditions for its employees, including in terms of health and safety, who have a duty to contribute to this by complying with the Company's rules in this area.

The Company undertakes to implement policies and methods for the active prevention of risks that could affect the health and safety of employees, to regularly monitor their proper application and measure their effectiveness.

It undertakes in particular to make its managers and staff responsible for safeguarding health and preventing workplace accidents and to organise the design and development of its products and its means of production in such a way as to promote the best possible working conditions.

In addition, all subcontractors working on the Company's premises are required to apply these health and safety policies and to comply with all legislation in force in France.

Local involvement

Papeteries du Léman is committed to integrating into the local community and contributing to local development. To this end, the Company is a partner of a "Sport, Health for All" day to fund equipment for people with disabilities.

It also supports the "*Jeunes et librairie*" project by welcoming students to show them how paper is made, an important stage in the book chain.

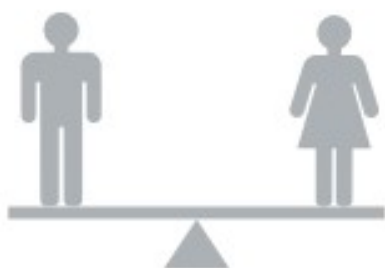
Finally, the Company promotes the pleasure of reading and solidarity as a member of the "*Lire et faire lire*" association, which calls on senior citizens to read to children.

Skills development

Equal treatment

Papeteries du Léman aims to treat all its employees with respect and fairness and promotes equal opportunities in all aspects of employment.

In its recruitment and career development activities, it undertakes not to discriminate on the grounds of age, gender, skin colour, nationality, religion, state of health or disability, sexual orientation or political, philosophical or trade union opinions.



The Company ensures that disabled people remain in employment. It pursues an active policy of promoting all areas of potential through disability awareness campaigns.

Integration and training development

The Company undertakes to promote training schemes that encourage integration into working life:

- access to different types of contracts which support students during their training (apprenticeship contracts in particular);
- trainees' access to the Company.

It endeavours to give all its employees, whatever their age, gender or position, access throughout their career to the training they need to do their job properly and build their career path.

Career development and employability

Given the specific nature of its businesses and the need to capitalise on its know-how to ensure process control, the Company considers the internal development of its employees' employability to be a priority.

Papeteries du Léman encourages all employees to play an active role in their professional development and is committed to ensuring equal opportunities for career development and mobility.

It encourages internal mobility to develop the employability of its employees. Particular attention is paid to the management of these internal movements to ensure their relevance in both the short and medium term.

Business ethics

Relations with customers, service providers and suppliers

The Company maintains relationships with all its stakeholders and, in particular, with its customers, suppliers and other business partners, based on honesty and fairness, in accordance with its values.

Consequently, it undertakes to honour its contractual commitments and to respect both the letter and the spirit of its commercial agreements. Employees must ensure that they act with professionalism, integrity and fairness in order to encourage customers to use the services of Papeteries du Léman.

Commercial activities, both in France and abroad, are carried out in compliance with local regulations, with which all employees must be familiar.

Papeteries du Léman strives to select its suppliers and service providers on the basis of quality, performance, cost and suitability to its needs. It expects an equivalent commitment from its partners in terms of respect for human rights, fair sales practices, protection of confidential information and intellectual property, the fight against corruption and, more broadly, business ethics.



Compliance with competition law

Papeteries du Léman ensures compliance with competition rules so that competition is fair and equitable. No action by the Company may prevent, restrict or distort competition.

Papeteries du Léman refuses all unfair competitive and commercial practices, in particular any agreement with competitors or any concerted practice concerning financial conditions, the allocation of services, markets or customers.

Not only any formal agreement, but also any concerted practice or informal discussion that has the effect or purpose of restricting free or fair competition is prohibited.

Financial conditions are therefore set completely independently, and our competitors and customers must make their decisions in complete freedom.



Fight against corruption

Corruption is an act by which a person vested with a specific function, whether public or private, solicits or accepts a gift, offer or promise with a view to performing, delaying or omitting to perform an act that falls, directly or indirectly, within the scope of their duties.

The Company reaffirms its policy of zero tolerance towards acts of corruption and influence peddling, whatever the methods, circumstances or stakes involved.

It undertakes to prohibit all forms of corruption in its relations with its customers and suppliers, whether in the form of gifts received or offered, or other payments, facilitation, with the aim of influencing a commercial decision.

Confidentiality

The Company endeavours to ensure confidentiality in the use of data, information, know-how, intellectual and industrial property rights and business secrets relating to its activities.

All employees are required to keep confidential information relating to Papeteries du Léman, its customers and its employees to themselves.

All confidential information must be kept and remain confidential, unless it is the subject of an authorised public dissemination, as its unauthorised disclosure could cause harm to the Company.

All employees must ensure that any information that is not public remains strictly confidential.

Each employee must:

- limit the disclosure of confidential information only to persons with a legitimate need to know it;
- keep securely, whatever the format (paper or electronic), all confidential data relating to the activities of the Company and the companies with which it has business relations;
- prevent the disclosure of confidential information to persons outside Papeteries du Léman (including members of their families).

Conflict of interest

A conflict of interest arises when, for example, an employee is in a position to influence a decision by the Company that is likely to confer a personal advantage on them or favour a relative or close friend.

The Company's business decisions are taken objectively, without any personal consideration.

Many situations can give rise to this type of conflict, particularly when an employee or someone close to them has direct or indirect interests in a competitor, a supplier or a customer of Papeteries du Léman. Ancillary activities on behalf of companies, a competitor, a customer of PDL, a partner or a supplier, as well as financial holdings in such companies, must be communicated to Management; they are only permitted with the express written authorisation of Management.

Financial holdings of close family members must be notified to Management. The same applies if a close family member is an employee of a competitor, customer or supplier.

Papeteries du Léman employees must identify the risks of conflicts of interest, disclose them to their line manager or to Management and act, in all circumstances, in the best interests of the Company. For the sake of integrity, they must also refrain from any action likely to give rise to an actual or potential conflict of interest.

Employees must not use their position within the Company for direct or indirect personal gain. When faced with a conflict of interest, the employee must not take part in the decision concerned.

Protection of Company assets

Protection of assets

The Company expects its employees to manage the Company's assets responsibly and to make business decisions on the basis of transparent risk-benefit analyses.

Assets include in particular patents, trademarks, know-how, lists of customers, sub-contractors or suppliers, information on markets, technical or commercial practices, commercial offers and technical studies, and more generally all data or information to which employees have access in the performance of their duties.

The integrity of Papeteries du Léman's business partners, among others, must therefore be verified according to the rules and practices in this area.

Employees are not authorised to use Company assets for personal, illegal or illicit purposes. This does not include items made available to them in connection with their duties or benefits in kind granted in accordance with the regulations in force.

Similarly, the Company's name may not be used by an employee for personal purposes, particularly on social networks or on the Internet. Under no circumstances may they speak in the name of and on behalf of the Company unless they have been expressly authorised to do so by Management.

Security of information systems

Employees must comply with the Company's Information and Communication Technology Charter.

Information technology, i.e. hardware, software, networks and the information they contain, is a key factor in the success of the Company and must be used responsibly and only for legitimate purposes.

Emails should be drafted with the same care as any other written communication. In particular, employees are prohibited from using PDL's IT systems to consult, save or send internet pages or messages with unlawful or defamatory content.

Personal use of the Company's IT resources, such as sending emails to third parties, must be kept to a minimum and must never involve the installation of hardware or software that does not comply with Papeteries du Léman IT standards or infringes the copyright of third parties.