

## STEARINERIE DUBOIS

### ETHICS CODE

#### - INTRODUCTION -

This document presents the rules of ethics in force at Stéarinerie Dubois. They are meant to define clear standards of professional conduct for the protection of all Stéarinerie Dubois employees, enabling them to progress in their careers and adapt to changing environments, regarding:

- Employee/employer relations,
- Compliance with laws and regulations,
- Health and safety,
- Commercial relations,
- Gifts, invitations and corruption,
- Risks regarding fraudulent payments and practices.

Founded nearly two centuries ago, Stéarinerie Dubois pursues its international growth based on its industrial expertise and innovations. Respecting men and the environment, the company develops and markets a comprehensive range of products and solutions for industrial clients in all sectors: cosmetics, food products, pharmaceuticals...

Optimizing the company's ability to meet its partners' needs, its work teams are fast-reacting, attentive to market trends and well-versed in many standards and reference systems: GMP, ISO 9001, ISO 14001, etc.

From its headquarters in an exceptional setting in the heart of a natural park, Stéarinerie Dubois achieves its goals with a sense of responsibility, always respecting its stakeholders and guaranteeing them the expected perennial viability through its governance, ethics and family shareholding.

Signatory of the UN Global Compact in 2017, Stéarinerie Dubois reaffirms its policy and commitment to upholding the ten responsibility principles regarding human rights, labor practices, environmental protection and fight against corruption.

In every field, Stéarinerie Dubois complies with all proper ethical, moral and legal principles.

## COMMITMENT STATEMENT BY THE CHIEF EXECUTIVE OFFICER OF STEARINERIE DUBOIS

The history of Stéarinerie Dubois, its professional activities and its values perpetuates a tradition of responsibility that I uphold. I want to pursue our mission by building a company that is responsible and civic-minded, toward its employees, its clients and the communities.

It is essential in our field to maintain total compliance with regulatory obligations. It is very important to me that Stéarinerie Dubois be consistent and irreproachable on this point.

Convinced that an active commitment to sustainable development is a necessity, and keen to help our customers' progress and anticipate future legal requirements, I am aware that our reputation and appeal are at stake. Therefore, I want to nurture a corporate model in which environmental, societal and economic performance all benefit each other.

This statement and ethics code reflect Stéarinerie Dubois's will to take responsibility alongside its clients and employees to help build a better future together.



Hervé Gondrand  
CEO

Boulogne-Billancourt, February 28th, 2017.

## Our employees

### Employee/employer relations

The Stéarinerie Dubois rules of conduct applies to everyone, regardless of his or her position in the company, and forms the grounds for all decisions at all times.

All employees have the right to ask questions, to express doubts and to share any misgivings they might have regarding their professional activities.

The employee/employer relationship is crucial at all levels of the company's organization. This relationship must be forthright, respectful and transparent, facilitating discussion and making it possible to address problems and find solutions.

Every question must receive an answer. Any employee who has a doubt about the ethical aspects of a decision or situation can ask the person who is in the best position to provide an answer:

- The first and the best source of information is one's direct superior. Working closely with their employees is part of the managers' job, making them best able to understand the situation.
- Employees who encounter a problem (ethical or other...) that cannot be solved are encouraged to contact their upper management, who will give the matter complete attention.
- Employees who prefer not to be identified have access to the DUBOIS ETHICS LINE which is free and open 24-hour.

### Compliance with laws and commitments

The managers, like all employees, must ensure respect for everyone in the company.

Stéarinerie Dubois is committed to comply with all legal measures concerning human rights.

Stéarinerie Dubois complies with the stipulations of labor law for all employees with no exceptions. The company exercises no discrimination of any kind, treating all employees equally throughout their careers. This zero-discrimination policy applies to each employee's professional function, whatever their status, gender, ethnic origin, age, political activities, religious practices and labor union affiliations.

The company's measures regarding freedom of expression, association and collective bargaining, as well as the health and safety protection, along with work schedules, salary grids and benefits are public and accessible to all. Stéarinerie Dubois is ruled by the *Convention Collective Nationale des Industries Chimiques* (national collective agreement for the chemical industries) and complies with all its stipulations.

Stéarinerie Dubois maintains strict financial management procedures to ensure that all employees are properly remunerated per their classification, experience and the work carried out.

In the case of internships, apprenticeships and other subsidized contracts, Stéarinerie Dubois adapts the workers' professional missions to their educational program, supervising them and paying them due compensation in compliance with the legal texts.

Stéarinerie Dubois is committed to complying with all laws of the countries where the company is represented.

## **Health and safety**

As a family-owned company with strong human capital, its employees' safety and health is a top priority of Stéarinerie Dubois. This principle is reflected in a preventive approach to health and safety in the workplace. The company does everything in its power to ensure the physical and mental integrity of all its employees, in terms of prevention, training, methods and equipment. Every employee is directly involved in protecting health and safety in the workplace. Compliance with all safety rules is a non-negotiable imperative.

The goal of the company's policy is a zero accident rate: every accident is one too many.

## Our stakeholders

### Communication

Stéarinerie Dubois's good reputation is the result of constant effort by everyone in the company. Transparency and clarity must be a priority in all communication initiatives. Each member of the company must be a guarantor of its brand image.

### Quality and safety of products and solutions for consumers

Stéarinerie Dubois markets chemical products mainly for the cosmetics, pharmaceuticals and food sectors. These products and their functions meet the specific needs expressed by our clients. We are listening to each client, adapting and personalizing our approach.

Stéarinerie Dubois anticipates each client's needs and offers a complete response, in terms of products quality and compliance with laws and regulations (REACH), thanks to each employee's dedication and professionalism.

Stéarinerie Dubois has been structured to obtain and maintain the levels of certification required by its clients' sectors, including Good Manufacturing Practices for the pharmaceuticals industry. Compliance is a core part of our industrial production process. Whenever we learn about a consumer complaint, we do everything we can to take the appropriate action as quickly as possible.

Stéarinerie Dubois strives to cultivate relations based on trust and integrity, making sure that the descriptions of our products and their functions are always relevant, accurate and precise.

### With our clients

Trust and integrity are a constant part of the company's relations with its clients.

At every level of collaboration, the dialogue is honest and transparent, in keeping with regulations, and enables an enduring partnership founded on mutual respect for commitments, as specified in our general terms of sale.

To this end, the company must respond to the client's needs as expressed in the specifications, while ensuring the confidentiality of all exchanges. Ongoing mutual trust, along with mutual respect, prevails in all relations with the clientele.

Sales agreements are to be concluded in compliance with the rules of ethical conduct, excluding any form of corruption.

The management is responsible for ensuring the application of these principles.

### **With our suppliers**

In its governance model, Stéarinerie Dubois seeks to extend its principles to both its clientele and its suppliers.

The buyer's approach is characterized by transparency, and all information from the supplier deemed to be confidential must be treated as such.

All suppliers are to be treated equitably, in terms of information and selection, the attribution of sales agreements must be based on objective criteria.

The equity principle encompasses the impartiality that buyers must demonstrate regarding all promises, commitments, contracts and payment schedules concluded with their suppliers. This also applies to the handling of any litigation or conflicts that might arise during commercial relations.

Compliance with all labor laws is required from suppliers, including the principles of non-discrimination, equal opportunity and freedom of association, the prohibition of child labor and undeclared labor, etc.

Stéarinerie Dubois is aware of the ongoing problems regarding workers protection and human rights in the intensive agriculture industry in some parts of the world, including

in the palm oil sector. These problems are aggravated when combined with poverty, weak law enforcement and presence of legal loopholes that exacerbate the challenge of making the palm oil sector sustainable.

In addition to closely and rigorously monitoring its palm oil suppliers' efforts to improve the situation, Stéarinerie Dubois requires new measures to progress in these areas, in all transparency.

Involved since 2011, Stéarinerie Dubois wholeheartedly supports the initiatives of the RSPO (Roundtable on Sustainable Palm Oil), to intensify the existing oversight mechanisms in order to make palm oil production a model of sustainability.

Payments to suppliers, subcontractors and all other service providers must comply with the relevant laws within the contractually specified deadlines.

In return, Stéarinerie Dubois requires that its suppliers, subcontractors and service providers maintain transparency and honesty, along with the highest professional standards. Stéarinerie Dubois expects them to provide high-quality products and services meeting its requirements.

### **With our competitors**

In France, as in many other countries, it is illegal to negotiate agreements with competitors or their representatives to fix or control prices.

Stéarinerie Dubois does not engage in any illicit agreements with its competitors to conclude a sale.

Prices are discussed during normal commercial relations with suppliers and clients.

Furthermore, Stéarinerie Dubois does not engage in any illicit commercial practices that might run counter to the principle of free competition.

## Our company

### Gifts, invitations and corruption

The employees of Stéarinerie Dubois must refuse any personal invitations, gifts or forms of remuneration from other business entities, except within the strict limitation that such invitations and/or gifts are related to particular occasions, are in keeping with the practices of the countries in which Stéarinerie Dubois operates, and comply with local tax codes and laws.

Similarly, giving gifts to clients must in every case comply with the legal limitations of the countries in which Stéarinerie Dubois operates, correspond to a particular event (the year-end holidays, the signing or renewal of a sales agreement, the opening of commercial relations, etc.), and not aim to influence a decision or alter the normal course of business.

Remunerations or remittances meant to obtain favorable treatment are completely prohibited.

Any violation of these stipulations is to be considered a clear act of corruption.

These stipulations apply both within and outside of France, and must be scrupulously followed by all Stéarinerie Dubois employees.

### Fraudulent practices and payments

Stéarinerie Dubois is committed to making no fraudulent use of corporate property, including the use of corporate funds or other assets for political purposes, for the benefit of any party or other such entity. This rule applies to direct or indirect payments, whether in the form of loans, advances, deposits, donations, services, gifts or memberships, and to all other such transactions, particularly for the benefit of a political organization.

## **Ownership of information**

Stéarinerie Dubois is prohibited from divulging to third parties any commercial information obtained on a confidential basis.

## **Sanctions**

Any employee who violates the Stéarinerie Dubois rules of ethics is subject to sanctions as specified by law and the company's internal rules.

## **Our corporate identity**

The Stéarinerie Dubois Ethics Code will be widely transmitted within the company and must be scrupulously followed. Stéarinerie Dubois thus reaffirms its will to proclaim and uphold its values:

International scope

Sustainable development

Expertise, Quality and Innovation

Agility

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