

ETHICAL CHARTER

STÉARINERIE DUBOIS

Our Ethical Charter serves as a guide that identifies our key issues and sets the framework within which we operate, both as a company and as individuals.

It helps ensure that every member of our teams applies the same principles and respects the commitments made by Stéarinerie Dubois Fils.

It supports us in staying vigilant, making informed decisions, upholding our reputation in the markets where we operate and with our stakeholders, and complying with the regulatory framework in which our company operates.

We are aware that we represent the company through our decisions and actions, and through the way we make and implement them.

We are committed to respecting human rights, promoting balanced working conditions, ensuring everyone's health and safety, and being exemplary in our relationships with all external stakeholders, in accordance with the terms of this ethical charter.

In addition, we rely on the company's internal Code of Conduct and, in case of doubt or questions, we know we can turn to the Legal Department.

In the event of any inconsistency between the provisions of this Charter and applicable laws or regulations, the more stringent provision shall prevail.

OUR SUSTAINABLE PERFORMANCE IS BUILT ON SHARED VALUES



Dear colleagues, dear community,

Our sustainable performance does not stem from a written document, it is the result of our daily decisions and actions.

More than a framework, this ethical charter is a shared compass that brings together our governance, our employees, our customers, and all our partners around a responsible future.

In a context marked by geopolitical uncertainties and inflexion of regulations, our company reaffirms its commitment to implementing the guiding principles of Respect, Responsibility, Integrity, and Performance.

Each action described here reflects a living commitment to a safe and healthy working environment, to respect for human rights throughout our value chain, to controlled quality and safety of our products, to continuous investment in innovation, and to exemplary business conduct.

This commitment also reflects our role in the global supply chain, where we contribute to building more sustainable industries.

Finally, we are active participants in the region that hosts our industrial site: through ongoing dialogue with institutions, local residents, suppliers, and research centers, we work toward shared development rooted in employment, training, and social responsibility.

As a leader, I am proud to carry this vision. Above all, I am convinced that it is through collective intelligence and the engagement of the women and men who make up Stéarinerie Dubois that we will continue to move our company forward toward an ever more positive impact.

Thank you to all those who bring this commitment to life, every day.

Hervé GONDRAND
Chief Executive Officer

A handwritten signature in blue ink, appearing to read 'Hervé Gondrand', written over a faint blue line.

4 ÉTHICAL PRINCIPLES

GUIDE US EVERY DAY

1

RESPECT

RESPECT FOR LEGAL, REGULATORY
AND CULTURAL FRAMEWORKS
RESPECT FOR HUMAN RIGHTS
RESPECT FOR INDIVIDUALS
AND WORKING CONDITIONS

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RESPONSIBILITY

RESPONSIBILITY
IN OUR COMMUNICATION
RESPONSIBILITY IN INFORMATION
PROTECTION
RESPONSIBILITY IN TRAINING
OUR TEAMS

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INTEGRITY

INTEGRITY IN OUR PRACTICES
INTEGRITY IN OUR RELASHIONSHIPS WITH CUSTOMERS
INTEGRITY IN OUR RELASHIONSHIPS WITH SUPPLIERS
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PERFORMANCE

PERFORMANCE DRIVEN BY OUR EXPERTISE
AND INNOVATION CAPACITY
INDUSTRIAL PERFORMANCE:
PRODUCT QUALITY AND SAFETY
SOCIAL AND ENVIRONMENTAL PERFORMANCE
OUR ATTACHEMENT TO OUR VALUES

1

RESPECT

COMPLIANCE WITH LEGAL, REGULATORY AND CULTURAL FRAMEWORKS

Stéarinerie Dubois is committed to complying with all applicable laws, regulations, and directives in the countries where it operates. This commitment also extends to internal policies in force, as well as recognized standards and practices within relevant cultural and sectoral environments.

The company ensures that these requirements are integrated into all its operational, commercial, and relational practices, in accordance with principles of responsibility, integrity, and respect for local contexts.

RESPECT FOR HUMAN RIGHTS

Respect for human rights applies both within the teams of Stéarinerie Dubois and to personnel throughout its value chain.

We rely on a robust foundation of international human rights standards, including:

- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The Universal Declaration of Human Rights
- Conventions, protocols, and recommendations adopted by the International Labour Conference of the ILO
- The International Bill of Human Rights
- The Convention on the Rights of the Child
- Principles and guidelines on human rights and human trafficking
- The Convention on Biological Diversity and the Nagoya Protocol on Access and Benefit-Sharing.

Without undermining the equality of all human rights, the company pays particular attention to issues related to:

- Labor rights, especially fair remuneration based on local market conditions and the prevention of forced labor and modern slavery
- Children's rights, particularly the prevention of child labor
- Community rights, including access to education, fair wages, equitable benefits, and individual and collective rights over land, territories, and resources, as well as the right to participate in decision-making processes
- Health and safety in the workplace
- Gender equality, and more broadly, equal opportunity and non-discrimination
- Prevention of all forms of harassment in and around the workplace.

Stéarinerie Dubois enforces zero tolerance for any acts that promote or contribute to human rights violations.

As a participant in multiple international value chains, we expect our suppliers, subcontractors, and supply chain partners to strictly adhere to international standards on human rights and working conditions.

This ethical imperative also applies to upstream suppliers and subcontractors, who must commit to the same international standards through our suppliers.

Accordingly, we expect our partners to commit to:

- Complying with all applicable national laws and international conventions, including the fundamental standards of the International Labour Organization (ILO)
- Explicitly prohibiting all forms of child labor, in accordance with ILO Convention No. 182 on the Worst Forms of Child Labour
- Ensuring decent, safe, and fair working conditions for all employees
- Guaranteeing access to transparent grievance mechanisms
- Implementing internal control mechanisms and, where appropriate, submitting to independent external audits to verify compliance
- Communicating transparently about the measures taken to uphold these ethical commitments
- Actively collaborating in the continuous improvement of social, environmental, and ethical standards across sectors.

Agricultural Commodities and Palm Oil Supply Chain

In the context of agricultural commodity supply chains, and particularly the palm oil sector, Stéarinerie Dubois actively supports the inclusion of smallholders in the sustainable supply chain.

In partnership with local cooperatives and the RSPO SCCS certification program, the company promotes compliance with environmental, social, and economic standards.

It ensures to:

- Promote responsible agricultural practices and sustainable resource management
- Support smallholders in the RSPO certification process
- Strengthen their economic autonomy and fair integration into global commercial supply chains
- Contribute to transparent traceability and the reduction of negative impacts associated with palm oil cultivation.

Stéarinerie Dubois is firmly committed to combating all forms of human trafficking and exploitation.

We adopt a zero-tolerance policy toward such practices and pledge to respond with the utmost rigor to any alert related to human trafficking within our supply chain.



WHISTLEBLOWER RIGHTS
INTERNAL STAKEHOLDERS

Whistleblower protection is implemented through our dedicated line, DUBOIS ETHICS LINE. Employees have direct access via a telephone line and a mobile application that guarantees anonymity. Protection against retaliation is ensured by our internal code of conduct and workplace regulations.

WHISTLEBLOWER RIGHTS
EXTERNAL STAKEHOLDERS

Stakeholder Engagement and Grievance Mechanisms

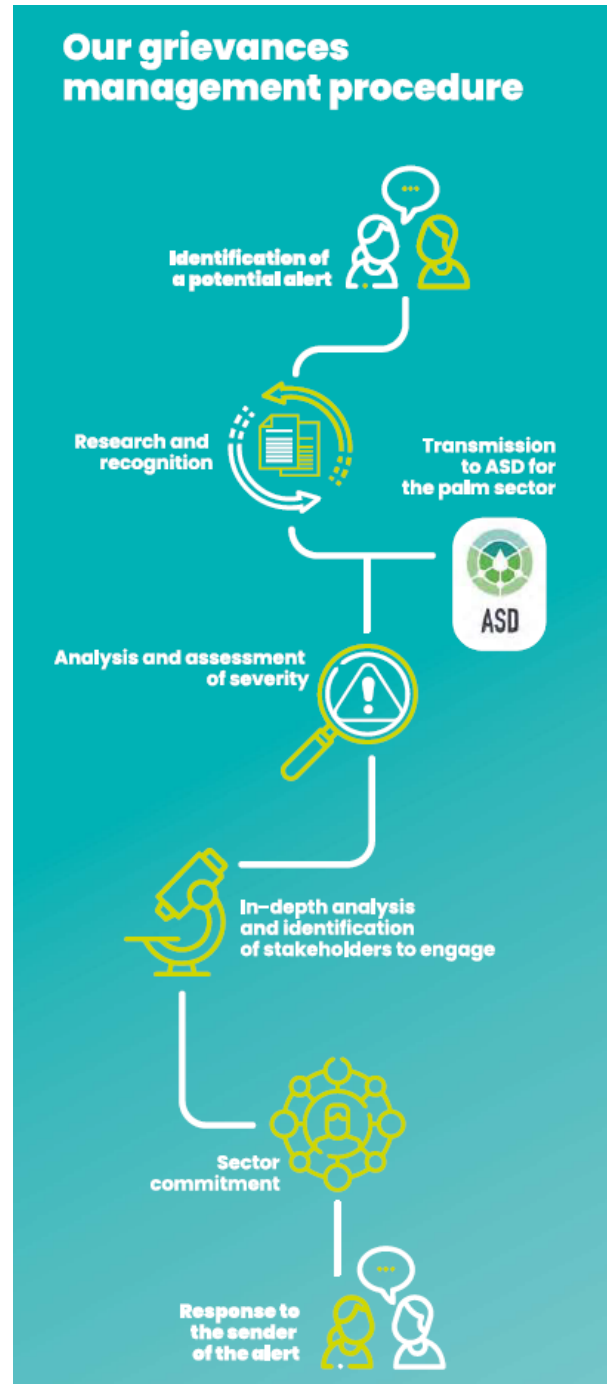
We strive to understand and take into account the perspectives and concerns of all our stakeholders - from upstream, particularly among potentially affected communities, to downstream, including our business partners and civil society.

We recognize their respective roles in alert and remediation mechanisms related to human rights violations.

External stakeholders are granted direct access to our grievance mechanism via the dedicated email address: grievance@stearinerie-dubois.com

Our commitment to human rights throughout our value chain is reflected in a proactive system. Depending on the supply chain concerned, investigations are either fully conducted by our internal teams or, in the case of the palm oil sector, handled by a task force from an external entity.

In the latter case, the third-party organization represents various suppliers as part of a collective action, aiming to increase impact and ensure more responsive upstream engagement within the supply chain.



RESPECT FOR INDIVIDUALS AND WORKING CONDITIONS

The rules of conduct at Stéarinerie Dubois apply to everyone, regardless of their position within the company. They guide decision-making at all times.

We promote diversity and give everyone a fair chance

We are committed to fostering a respectful, inclusive, and equitable work environment for all.

We reject all forms of discrimination, whether direct or indirect, based on origin, gender, age, family status, pregnancy, physical appearance, surname, health status, disability, sexual orientation, gender identity, political opinions, religious beliefs, or actual or perceived membership in an ethnic group, nation, or race.

Our recruitment, professional development, training, and evaluation practices are based on objective, transparent, and fair criteria.

We are committed to preventing any discriminatory behavior and to taking necessary measures, including disciplinary action, in the event of non-compliance with these principles.

We support gender equality

We are committed to ensuring genuine professional equality for all, in a sector where expertise, safety, and rigor are essential.

Our recruitment, development, and recognition processes are based on objective criteria, without gender distinction.

We promote gender diversity across our professions and ensure equal opportunities for advancement.

We calculate and publish our gender equality index annually, which continues to show positive progress.



We prioritize the safety and health of everyone

Stéarinerie Dubois is committed to providing all its employees with safe and healthy working conditions and to continuously improving them.

We place the safety, health, and well-being of our employees at the heart of our activities.

In an environment exposed to technical risks, we implement rigorous procedures, provide regular training, and supply appropriate equipment.

A dedicated safety coordinator is present at the production site. He continuously ensures compliance with procedures, support teams, and acts as a reference in prevention matters.

We also pay close attention to the mental health of our teams and implement measures to prevent psychosocial risks, including employee training and regular meetings of a dedicated committee.

We promote a culture of shared vigilance, in which every employee plays an active role in safety.

2

RESPONSIBILITY

RESPONSIBILITY IN OUR COMMUNICATION

Our commercial communication

Every employee and partner involved in commercial relations acts as an ambassador of the Stéarinerie Dubois brand image.

As such, they are expected to adopt exemplary communication behavior, in line with the company's ethical values and identity.

We ensure that our professional communications adhere to the following principles:

- Clear, accurate, and appropriate information shared with relevant stakeholders.
- Respect for the confidentiality of exchanges and sensitive data.
- Consistency and traceability of contractual, technical, and commercial communications.

Our legal department validates all our commitments and those of our co-contractors prior to contract finalization.



Our communication on social media

Stéarinerie Dubois ensures that its communication on social media faithfully reflects its values, ethical commitments, and brand image.

- We share respectful, factual, and responsible content, in line with our CSR principles and the company's transparency policy.
- We safeguard the confidentiality of professional and strategic information.
- We avoid any statements or content that could harm the reputation of our partners, employees, or stakeholders.

RESPONSIBILITY IN INFORMATION PROTECTION

Stéarinerie Dubois ensures the protection of personal, professional, and confidential information in the context of its relationships with business partners.

It is committed to complying with applicable legal provisions, including the General Data Protection Regulation (GDPR), as well as any relevant sectoral or local regulations.

We collect, process, and retain information strictly within the scope necessary for contractual, technical, and/or regulatory purposes.

We implement technical and organizational security measures to prevent unauthorized access, loss, alteration, or disclosure of information.

We regularly train our teams on emerging threats and best practices in individual cybersecurity.

We commit not to transfer or share information with third parties without prior consent or a legal basis.

We provide transparent information to our partners regarding how data is used and the rights related to confidentiality.

We honor our contractual commitments regarding professional secrecy, including in the context of outsourced or subcontracted services.

RESPONSIBILITY IN TEAM TRAINING

Stéarinerie Dubois recognizes continuous training as a fundamental lever for performance, ethics, and professional responsibility.

It is committed to ensuring the development of its employees' skills in line with regulatory, technical, and societal developments in its sector.

We implement training programs tailored to the functions, responsibilities, and ethical challenges of each function.

We guarantee equitable access to upskilling opportunities, including awareness of CSR issues, compliance standards, quality, and safety.

We encourage knowledge sharing and the recognition of internal expertise, fostering both individual and collective progress.

We regularly renew essential training, particularly in safety, cybersecurity, and business ethics.

We update regulatory knowledge relevant to our business operations on a regular basis.

We promote employee accountability in applying acquired knowledge to support the company's commitments.



3

INTEGRITY

Stéarinerie Dubois conducts all its activities in accordance with the principles of integrity, fairness, and transparency.

These fundamental values guide both individual and collective behavior within the company and in its interactions with all stakeholders.

INTEGRITY IN OUR PRACTICES

We prevent conflicts of interest

Stéarinerie Dubois is committed to preventing any situation that could give rise to a conflict of interest in the course of its activities, business relationships, or partnerships.

The company expects its employees, suppliers, and partners to act transparently and loyally to ensure the integrity of decisions and commitments made.

We exercise vigilance regarding gifts and invitations

Stéarinerie Dubois prohibits any practice that could unduly influence a professional or business decision through the giving or receiving of gifts, invitations, or other personal benefits.

The company ensures impartiality, fairness, and independence in its internal and external relationships.

We define clear thresholds and rules regarding the acceptance or offering of gifts and invitations, in line with professional practices and legal obligations.

We prohibit any form of gratuity linked to contract negotiations, tenders, or strategic decision-making.

We raise awareness among employees and partners about the ethical management of non-contractual invitations and benefits.

We combat corruption, illicit payments, and money laundering

Stéarinerie Dubois enforces a zero-tolerance policy toward all forms of corruption, illicit payments, and money laundering.

In its professional and commercial relationships, the company acts in compliance with applicable local and international laws in all countries where it operates, including OECD conventions, the French Penal Code, and commitments under the United Nations Global Compact.

We prohibit any payment or benefit intended to unduly influence a decision, obtain or retain business, or secure preferential treatment.

We reject any illegal or suspicious payment or gift, regardless of its form, amount, or frequency.

We have implemented internal procedures for the prevention, monitoring, and reporting of risk situations, including through a confidential ethics alert channel.

We raise awareness among employees and partners about the risks associated with corruption, influence peddling, and money laundering.

We are committed to fully cooperating with the competent authorities in the event of an investigation or audit related to these issues.

Furthermore, we have formalized our adherence to Principle 10 of the United Nations Global Compact and require our suppliers, subcontractors, and business partners to make an equivalent commitment, ensuring:

- The absence of corrupt or fraudulent practices in commercial relationships
- The implementation of appropriate internal prevention and control mechanisms
- Transparency in transactions and in the awarding of contracts

INTEGRITY IN OUR RELATIONSHIPS WITH CLIENTS

We strive to build a sustainable ecosystem with our customers, based on mutual and ongoing trust, respect, and shared benefit.

We communicate honestly and rigorously about our products, services, and commitments, in compliance with applicable regulations.

We honor contractual terms, agreed deadlines, and specific commitments aligned with our customers' expectations, in accordance with applicable standards.

INTEGRITY IN OUR RELATIONSHIPS WITH SUPPLIERS

Stéarinerie Dubois is committed to maintaining fair, transparent, and respectful business relationships with all its suppliers and co-contractors.

We ensure fair treatment of our suppliers, both in terms of access to information and throughout the selection process, contract management, payment terms, and all other agreed elements.

We award contracts based on objective criteria, in compliance with defined ethical and technical requirements.

Our general purchasing conditions are made available to our suppliers, subcontractors, and business partners and are automatically attached to our purchase orders.

Our general purchasing conditions are [available here](#).



We exclude any unfair or fraudulent practices, whether commercial, contractual, or relational.

We handle requests, complaints, or disputes fairly and professionally, in accordance with legal procedures and recognized governance standards.

INTEGRITY IN OUR RELATIONSHIPS WITH COMPETITORS

Stéarinerie Dubois conducts its business in strict compliance with the principles of fair competition and commercial integrity. The company rejects any unfair, restrictive, or fraudulent practices that could distort competitive balance or compromise its ethical reputation.

We comply with national, European, and international competition laws and regulations, including the French Commercial Code, European Union law, and OECD standards.

We prohibit any collusion, exchange of sensitive information, abuse of dominant position, or anti-competitive practices, regardless of the markets involved.

We strive to maintain healthy, transparent, and respectful relationships with our competitors, based on the legitimate differentiation of our offerings, without resorting to disparagement or misinformation.

We raise awareness among our employees about the risks associated with prohibited commercial practices and their individual responsibilities.

SANCTIONS

Stéarinerie Dubois places fundamental importance on compliance with its ethical charter by all employees, partners, suppliers, and stakeholders.

Any breach of the principles, rules, or commitments defined in this charter may result in corrective, disciplinary, or contractual measures, depending on the severity and context.

Accordingly, the company reserves the right to:

- Implement corrective or awareness-raising actions on professional ethics, either preventively or remedially
- Impose disciplinary sanctions on its employees, in accordance with the provisions of the French Labor Code and the company's internal regulations
- Terminate a collaboration or suspend a partnership with any external party in the event of a proven violation of contractual ethical commitments
- Initiate, where applicable, civil or criminal proceedings in the event of a breach of applicable laws or serious harm to the company, its stakeholders, or its reputation.

The company ensures fairness, proportionality, and respect for rights in the handling of any situation involving non-compliance with the charter.

4

PERFORMANCE

PERFORMANCE DRIVEN BY OUR EXPERTISE AND INNOVATION CAPACITY

Stéarinerie Dubois cultivates a long-standing and recognized expertise in the design and manufacture of esters. Its positioning is built on over two hundred years of know-how, reinvention, and continuous adaptation to market challenges.

As a cornerstone of its strategy, innovation is approached as a structured, proactive, and collaborative process aimed at meeting the evolving needs of its customers and addressing societal challenges related to product performance, sustainability, and safety.

We conduct regulatory and technological monitoring to anticipate standards and integrate principles of green chemistry, sustainability, and traceability.

Our practices are based on demanding, internationally recognized frameworks such as:

- ISO 9001 (quality)
- ISO 14001 (environment)
- The European REACH regulation (Registration, Evaluation, Authorization and Restriction of Chemicals)
- Good Manufacturing Practices (GMP)

We invest in applied research, custom formulation, and process improvement. As a member of competitiveness clusters, our team of researchers engages in scientific collaborations with other companies, university research laboratories, and public research institutions,

Our expertise is built on the synergy between our scientific, industrial, and commercial teams. Our integrated vision of innovation, grounded in technical rigor and agility, enables us to offer high-performance, sustainable esters tailored to the needs of our partners.

fostering transdisciplinarity and responsible innovation.

Notably, our work on improving ester production processes to reduce resource and energy consumption has made Stéarinerie Dubois a key expert and player in green chemistry.

We continuously invest in our industrial facilities, reflecting our commitment to performance, environmental responsibility, and quality of service.

Our strategy enables:

- Optimization of our production capacities and technical control of our processes
- Reduction of CO₂ emissions through energy optimization and more efficient technologies
- Enhanced responsiveness and reliability in serving our customers, with controlled lead times and strengthened traceability
- Support for sustainable industrial innovation.



INDUSTRIAL PERFORMANCE: PRODUCT QUALITY AND SAFETY

Stéarinerie Dubois designs and markets chemical solutions for the cosmetics, pharmaceutical, food, and broader industrial sectors.

Each product is developed to meet specific functional and operational needs expressed by our customers, in line with the requirements of their activities. The company pays close attention to each stakeholder and adopts a personalized approach based on technical relevance and co-development of tailored solutions.

We place the quality and safety of our esters at the core of our industrial identity and ethical commitments. We are uncompromising in applying strict standards at every stage, from product design to commercialization.

OUR COMMITMENT IS REFLECTED IN:

- **Strict adherence to international standards**
 - ✓ **ISO 9001, Quality Management:**
We implement robust processes to ensure operational control, continuous improvement, and customer satisfaction, supported by a rigorous organization based on indicators, internal audits, and a shared quality culture.
 - ✓ **GMP, Good Manufacturing Practices:**
We ensure the safety of finished products, control contamination risks, and maintain traceability of materials in accordance with pharmaceutical and cosmetic sector requirements. GMP also ensures that each production stage meets strict hygiene and control criteria.
 - ✓ **ISO 14001, Environmental Management:**
We reduce our ecological footprint through optimized management of resources, emissions, and energy consumption. Its implementation reinforces our commitment to responsible production aligned with societal expectations for sustainable development.
 - ✓ **REACH, European Regulation on Chemical Substances:**
We ensure user and stakeholder safety through rigorous substance evaluation, chemical risk management, and transparency of ingredient information.
- **Prioritizing end-user safety** by ensuring the harmlessness, stability, and quality of raw materials and finished products.
- **Implementing enhanced control protocols**, including in particular analytical testing at various stages of the manufacturing process.
- **Fostering an internal culture based on scientific vigilance and continuous team training** to ensure ongoing improvement in product reliability.

SOCIAL AND ENVIRONMENTAL PERFORMANCE

As a family-owned company located in Scoury at the heart of a natural park - an exceptional environment - Stéarinerie Dubois has made environmental respect a true corporate ethic.

It operates with a constant focus on enhancing its positive impact through its contribution to the development of greener, less polluting, and more responsible chemistry.

We are actively engaged in a continuous improvement approach to our social and environmental performance throughout our value chain, in alignment with principles of responsibility, transparency, and sustainability.

The ongoing improvement of our Corporate Social Responsibility (CSR) is based on a robust foundation of commitments and monitored actions, the results of which we share with our stakeholders through a voluntary annual CSR report.



We adhere to the **10 fundamental principles of the United Nations Global Compact**, with strict application of its four pillars: Human Rights, International Labour Standards, Environmental Protection, and Anti-Corruption.

We are members of the **Roundtable on Sustainable Palm Oil (RSPO)** for the palm oil sector, whose principles and criteria we support, as well as of the Sustainable Castor Oil Association for the castor oil sector. Our Mass Balance certifications for both supply chains demonstrate our commitment to promoting good agricultural practices and equitable socio-economic development within these sectors.

As a member of **Action for Sustainable Derivatives (ASD)** - a collaborative initiative bringing together stakeholders from the cosmetics, pharmaceutical, food, and oleochemical industries - we contribute to the sustainable transformation of palm oil derivative supply chains.

Our sourcing of plant-based raw materials is governed by a strict policy of respect for forest ecosystems and natural areas. We are firmly committed to zero deforestation and no forest degradation, in line with our NDPE (No Deforestation, No Peat, No Exploitation) policy

and the terms of the European Union Deforestation Regulation (EUDR). This vigilance applies to all sourced commodities, with particular attention to palm oil derivatives. Our Sustainable Sourcing Charter is [available here](#).

As part of our climate policy, we conduct an annual carbon footprint assessment, including the evaluation of CO₂ emissions across scopes 1, 2, and 3, and the implementation of reduction targets within a climate transition and adaptation plan.

We carry out industrial audits to identify and manage sustainability levers across our facilities and processes.

We implement a responsible waste management strategy, including source separation, drastic reduction of non-recoverable waste, and optimized recovery of co-products

from chemical processes, in line with a circular economy approach.

Finally, we submit our practices to evaluation by recognized external organizations, including:

- **EcoVadis**, for the assessment of our CSR performance across four key themes: environment, social & human rights, business ethics, and responsible purchasing.
- **CDP** (formerly Carbon Disclosure Project), which evaluates environmental policies and actions related to climate, deforestation, and water resource preservation.

OUR ATTACHMENT TO OUR VALUES

As a family-owned company, Stéarinerie Dubois is deeply committed to its values of independence.

Rooted in its local territory, the company maintains constructive dialogue with local authorities and institutions, as an economic player generating employment and activity, and more broadly with all its stakeholders.

Stéarinerie Dubois does not take public positions or engage in lobbying activities aimed at negatively influencing policies to the detriment of the environment.



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