

CODE OF ETHICS



« True freedom listens to the laws »
(Jacques Perk)



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A. MANAGEMENT COMMITMENT TO ANTI-BRIBERY

As part of my role of Chairman of the Board of E.M.I – Electro Mécanique Industries, I am responsible of conformity ANTI-CORRUPTION policy.

To ensure this anti-corruption conformity management and promote this culture of integrity and zero tolerance for corruption, I decided to appoint Mrs. Noëlle BOLIS as responsible in charge of anti-corruption conformity and Mrs. Valérie HAVET as assistant of the responsible of anti-corruption conformity.

Their task is to settle the management system, make it applied by all member of the staff and report me on regular basis. To ease the required mission, this team has full autonomy.

For that purpose, the following lines have been determined:

- A. To set up an anti-corruption management system in conformity with iso 37001 standard
- B. To ensure permanent training and awareness of the staff concerning anticorruption risks and their processing
- C. To manage the risks related to anticorruption conformity
- D. To set up a reporting system to manage potential suspicions

Done at Le Vernet, on December 16th 2021

Stéphane COULON

Chairman





B. MESSAGE FROM THE MANAGEMENT

Through the engagement of its Management included page 4 of the present code, EMI Company commits to respect a set of rules and duties in the day to day work and wish to formalize them with the present Code of Ethics.

The strict application of this code of conduct, implicitly followed in our company since day one, is based on strong values such as honesty, loyalty, fairness, transparency. It confirms EMI involvement in anti-bribery is without any compromise or concession.

The present Code of Ethics will be distributed to all EMI's internal and external partners, in order to reflect the desire to involve everyone, at any level, in this approach. We are aware that this fight have a chance to succeed only if all actors are working together, in the same direction.

C. OUR CONVICTIONS

The professionalism that should animate us in all our actions with our partners should bring us to:

- Base all relationships on honesty and ethics;
- Respect each other and oneself in a climate of assertiveness;
- Communicate the right way;
- Have, at all levels, a responsible and honest staff towards their Company and its partners;
- Respect the Law,
- Anticipate and manage conflict of interest.

These convictions are the essence of our anti-bribery approach.



D. OUR ANTI-BRIBERY MANAGEMENT SYSTEM

« Set of rules and duties governing a profession, the conduct of those who practice it, the relationship between them, their clients and the public. »

Starting from this definition, we established a set of rules and we request all our partners, both internal (our human resources) and external (our customers and public/private providers), to apply them.

In order to implement our anti-bribery policy, we decided to rely on our quality management system ISO9001 certified, completed with instructions to comply with the ISO37001 standard. The instructions are a complement of the procedures applicable in our QMS ISO9001 and they explain how we deal with anti-bribery.

1. Staff and ethics

Any fight against bribery requires the employee's knowledge of the possibilities they might face.

For that reason, our staff is regularly sensitized, about the human factors, basis of potential incidents, as well as internally or externally trained with case studies to be in position to recognize bribery. Those two points are managed through our quality management system procedures which are in application for more than 10 years.

Permanent education and training of our staff on human factors and anti-bribery, allow our collaborators to have an ethic and honest relationship with our partners.



2. Anti-bribery enforcement: our method

The method chosen to combat bribery at EMI level is described in the different procedures of our management system and all the employees of our company are able to apply them.

Safe and transparent relationships between members of the staff are facilitated by regular meetings that allow us to define/update alerts and generate investigations if needed, always in an assertiveness attitude.

Management and all collaborators of the company must bring outside of the company what has been decided and established within the company, in order to allow all the partners (internals and externals) to work in good faith, integrity and transparency to proscribe bribery.

3. Alerts and investigations

As indicated here above, practicing a fair communication allow us to expose easily the unclear aspects or doubts we can face. The regular meetings we hold, go in that direction.

Each knowledge or suspicion related with a case or action that seems to be an infringement to the Ethic code, to the operative Law or to the internal regulations of the company, should be reported in a responsible manner to the person in charge of anti-bribery conformity designated by Management.

Investigations can be carried out, if needed, according to the procedure described in our management system for establishment and follow up.



Anti-bribery compliance team:

Anti-bribery conformity manager: Noëlle BOLIS

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Confidential investigations may be conducted, if required.

Chosen method for setting up, follow up and management of them are described in our anti-bribery management system.

4. Penalties

Failure to respect the present code of ethics by any member of the company, whatever its hierarchical level, can be considered as a fault and expose him to the application of sanctions envisaged in the company rules.

