

CODE OF CONDUCT



CRISTAL_UNION

C'est ensemble
que nous avançons.

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1. Note from the General Manager

With 2,000 employees, CRISTAL UNION produces and sells crystallized sugar, alcohol, bioethanol and other animal feed products (pulp, alfalfa, ddgs) either directly or through its subsidiaries and partnerships, made from sugar beets and alfalfa grown by our 9,000 cooperative members and wheat.

A major player in the agri-foods industry, we make our expertise available to our customers, suppliers, cooperative members and employees, in order to meet their needs and requirements, in compliance with all applicable legal and regulatory obligations. In this context, CRISTAL UNION is committed to developing organic agricultural production methods.

New national and international policies are increasing in number and are profoundly transforming our markets and our environment, in a world in constant evolution.

Against this background, we must anticipate and address the challenges presented to us and show our ability to overcome these and plan for future developments by capitalizing on our areas of expertise and know-how in conjunction with all of our stakeholders (employees, members, financial and institutional partners).

While it is important to reach our objectives, the way in which we do this is also just as important. CRISTAL UNION employees are expected to comply with the law and regulations when performing their duties and must take precautions when engaging in any activities where there is any risk involved.

This code of conduct sets out the principles and rules of conduct which apply to everyone, whatever their position or status or job title and we are committed to compliance with these in the course of our assignments and to implement them on an everyday basis. These rules reflect our founding values, our culture and our business ethics through strong principles.

This document is a collective commitment and an individual requirement needed to promote our development in a way that is responsible, supportive and sustainable.

The success of CRISTAL UNION depends on the behavior of each and every one of us.

We would like all employees of the Group to take this code of conduct on board. Although this code cannot cover all situations, the principles of respect, probity, equity and transparency must guide our behavior. We trust each of our employees and their own personal judgment and that they will strive to apply all of the principles and values contained herein, the source of our contribution to the group, our cohesion and our success.

Xavier Astolfi and Stanislas Bouchard

2. Group missions, vision and values

The collective approach has always been our driving force to anticipate changes, defend our values and meet challenges.

OUR MISSION

"Bring together long-term interests: those of our customers, our cooperative members, our employees and our partners for an agriculture and an industry that are demonstrations of excellence, efficiency, responsibility and that are geared towards the challenges of tomorrow".

At the heart of the challenges we face today and tomorrow is a huge responsibility: that of conserving the land we cultivate. In direct contact with the environment on a daily basis, our cooperative members are the first to be aware of the challenges to be overcome. They are constantly adapting their agricultural practices to make them ever more sustainable. With them, we are investing in R&D in order to determine the best means of exploiting the full potential of our raw material, sugar beet.

We are committed to linking our industrial performance with clear environmental choices. After completing the energy transition of our sites, we are going even further. Cristal Union is gearing up to be the industry leader in decarbonization by reducing its greenhouse gas emissions by 35% by 2030. To do this, we are investing in innovative technologies, promoting the circular economy approach and biomass production.

Anchored in the heart of our regions and resolutely oriented towards the future, we know that much remains to be developed. To do this, we will remain faithful to the roots that we hold so dear and we intend to associate as much as possible our stakeholders in our operations.

OUR VALUES

UNITED

Because we are a cooperative,

Because of this **collective strength** that we find in the people employed within our group,

Because of how we work **together every day** to improve our practices,

Because we never lack new projects and we know how to share ideas and build effective solutions together to help us achieve our goals.

EXPERTS

Because, no matter what the activity or field of expertise, we **support** our employees on a daily basis to acquire the right skills and the expertise they need to grow and develop within our Group.

AGILE

Because we know how to adapt our organization, our ways of working and our facilities to the challenges of the unexpected,
Because we know how to anticipate tomorrow's challenges.

COMMITTED

Because we are a **committed organization with an environmental conscience**,

Because we recover 100% of our raw material, sugar beet, thus conserving precious resources like water and energy,

Because we are able to develop our product ranges and our packaging into more responsible product ranges,

Because, within our Group, we have the support of committed women and men on a daily basis.

3. Framework and objectives of the code of conduct

In order to support the development of our activities, Cristal Union is committed to sustainable development and accepts our corporate responsibilities as part of the company's policies, all in the respect of our stakeholders and compliance with current legal requirements.

This code of conduct, drawn up in accordance with Law No. 2016-1691 of December 9, 2016 on the subject of transparency, combating corruption and the modernization of the economy, constitutes one of the pillars of our CSR policy. It constitutes a practical guide in terms of ethics that all Cristal Union Group employees must follow when carrying out their duties. It asks each employee to act in accordance with the Group's values and in respect of all of our stakeholders: colleagues, growers, partners, suppliers, customers, government representatives, etc.

This code of conduct aims to provide employees with broad principles to be used to guide decision-making, in accordance with the Group's values. Each employee must refer to it in order to know what position to adopt in case of doubt concerning, in particular, whether a decision is sound or the ethics of a particular practice. Where the code of conduct does not provide sufficient answers to an employee's questions, that employee should refer their questions to their direct or nearest manager, or the Group's Ethics Manager, where appropriate.

Integrity, honesty and solidarity between each of us are essential to our development and to the future of our Group, as well as to the well-being of all of our stakeholders, internal as well as external.

On top of complying with the law and applicable regulations, particularly in terms of employment, commerce, transport, GDPR and environmental law, the Cristal Union Group applies the ETI (Ethical Trading Initiative) code, SMETA (Sedex Members Ethical Trade Audit) standard and supports the United Nations Global Compact initiative in terms of the respect for Human Rights.

Who is this code aimed at?

The Group's code of conduct is aimed at all employees of Cristal Union Group without exception, in France and in all countries in which the Group operates. By extension, all suppliers, service providers and partners of the Group or its subsidiaries are required to comply with it.

4. The Group's responsibilities to its employees

Respect for the individual

Cristal Union Group is convinced that diversity amongst its personnel is a source of wealth and essential to our success. We intend to provide a professional framework in which the dignity of each employee is recognized and respected. To do this, Cristal Union Group undertakes to:

- Respect each individual with equity and dignity,
- Prohibit and combat any form of discrimination, particularly on the grounds of age, sex, ethnic origin, health, disability, sexual orientation, gender identity, political opinions, trade unionism, religious beliefs, family circumstances or personal physical appearance,
- Prohibit and combat all forms of sexual and/or moral harassment,
- Promote equal opportunity, whether in terms of recruitment or professional development.

Each employee must ensure that their behavior does not infringe upon the rights and dignity of their colleagues, adversely affect their physical or mental health or compromise their professional advancement.

Well-being of employees and respect for privacy

Cristal Union Group aims to provide a safe, healthy and productive workplace in which all employees have the opportunity to flourish. To do this, Cristal Union Group undertakes to:

- Comply with all current regulations relating to health and safety,
- Train employees and raise their awareness in order to ensure the safety of all stakeholders working at its premises,
- Offer decent and healthy working conditions to all employees and also to protect their health and safety,
- Respect the privacy of each employee and implement working practices which provide a balance between an employee's professional and private lives,
- Respect the confidentiality of personal data and take all appropriate measures to ensure the security and protection of data in accordance with the General Data Protection Regulation.

Each employee is required to follow the procedures and instructions provided to them during training or those of which they have been informed and which apply to their duties or to the sites at which they are required to work.

5. The Group's responsibilities to its partners

Respect for Human Rights and international principles in terms of workers' rights

Cristal Union Group monitors its activities to ensure that they comply with international standards and, via its own sphere of influence, promotes the:

- United Nations Universal Declaration of Human Rights,
- Conventions of the International Labour Organization (ILO),
- Guideline principles of the Organization for Economic Cooperation and Development (OECD),
- 10 principles of the Global Compact, of which the Group has been a signatory since 2016, which include:
 - Prohibition of child labor,
 - Prohibition of forced labor and undeclared labor,
 - Respect for freedom of association and recognition of the right to collective bargaining.

Safety and product quality

Customer satisfaction is one of the pillars of our CSR strategy and constitutes one of the fundamental conditions underpinning the future success of our operations.

Cristal Union Group undertakes to:

- Comply with safety regulations for all of its products,
- Comply with all regulations relating to our industrial operations and transportation to our customers, particularly safety standards specific to the production and transport of dangerous substances,
- Provide all of our customers, consumers and businesses with products of a quality that complies with their specifications.

Accuracy of financial and business documentation

Providing reliable information means that Cristal Union can establish relationships with our stakeholders based on trust. Cristal Union Group undertakes to:

- Comply with regulations governing the publication of financial and non-financial reports,
- Ensure the reliability of published data,
- Define and implement effective internal auditing systems,
- Cooperate in complete transparency with auditing and supervisory bodies.

Use of Company assets

Cristal Union and its subsidiaries shall provide their employees with tools, goods and services which allow them to carry out their duties in the best conditions. These goods and services remain the property of Cristal Union or of its subsidiaries. All employees must use the equipment provided in strict compliance with internal

regulations and with this code of conduct, for professional purposes only, in order to fulfill their duties and in the interests of Cristal Union Group.

The use of computer equipment by employees is subject to the Cristal Union Information Technology Charter.

Any illicit or abusive use of these tools shall be punished.

Conflict of interest

Whoever the employee or whatever their role, it is essential that the interests of Cristal Union Group are put first, above any personal interest there may be.

In other words,

- No employee of Cristal Union Group is permitted to profit directly or indirectly, for their own benefit or that of another, from their professional position within Cristal Union Group,
- No employee is permitted to have personal interests in a third party likely to influence their professional activities within Cristal Union Group.
- No employee of Cristal Union Group is permitted to provide their own personal contact details to existing or potential suppliers.

Where there is a risk of a conflict of interest for an employee of Cristal Union Group in the course of their duties, the employee in question is required to alert their manager and/or the Group Ethics Manager in full transparency and to cease any contact with the third party in question and await a decision by their manager and/or the Group Ethics Manager.

Confidentiality

The use of data belonging to Cristal Union Group, or one of its subsidiaries or partners (customers, suppliers) must be carried out whilst ensuring that the confidentiality of these data is maintained and the rights of its owner are respected. Cristal Union Group undertakes to:

- Comply with regulations governing the confidentiality of information in terms of intellectual and industrial property rights,
- Comply with regulations governing the protection of personal data under the terms of the General Data Protection Regulation.

All employees undertake to take any precautions necessary to ensure that the confidentiality of all the data to which they have access in the course of their duties, either directly or by chance, is respected. Employees shall also comply with the rules relating to the dissemination, reproduction, use, storage and destruction of the data concerned. All of these obligations cover all types of media, including social media and electronic messaging systems. These same obligations shall continue to apply after the departure of the employee from the Group or from one of its subsidiaries.

Combating corruption, gifts and invitations

Cristal Union Group shall comply with all applicable regulations in terms of corruption in the countries in which it operates, particularly the 3 following regulations whose scope is international:

- "SAPIN 2" law in France,
- "Foreign Corrupt Practices Act" in the USA,
- "Bribery Act" in the United Kingdom.

The Group shall provide training in subjects related to ethics governance and corruption within the company to all employees likely to be confronted by situations involving corruption, due to their position or their function.

In order to maintain the required level of ethics required by our operations and founding values, Cristal Union Group requires each employee to:

- Refuse (or refrain from seeking) any gifts, payments or gratuities for themselves or for a third person, whether physical or moral, with whom the employee has or has had commercial relations and which could potentially affect the required level of impartiality for their position or be perceived as such,
- Refrain from making any payment, or offer advantages, gifts or services for which the amount in monetary terms would exceed a simple mark of courtesy, to any physical or moral person, whether public or private, in order to obtain a favor, or gain or maintain business dealings or any other illicit commercial advantage.

Gifts and invitations to events may only constitute a mark of courtesy acceptable within the framework of business relations under certain conditions, such as:

- If their value is symbolic, i.e. below €80,
- If they are offered in full transparency with respect to the Group,
- If the regulations and customs in the country in which they are offered permit them,
- If they don't involve a counterpart.

Gifts and/or invitations to events which do not meet the aforementioned conditions may be considered acts of corruption.

Cristal Union Group selects partners who commit to strict compliance with the same principles and regulations governing corruption.

Preventing illicit payments and money laundering

Money laundering is the act of deliberately hiding the illegal origin of capital by reinvesting it in legal activities. Such money originates in illicit activities such as the sale of arms, trafficking of narcotics or human organs, theft, tax fraud, etc.

Participating in money laundering activities is a financial crime and carries serious risks for the company's image and future success. To prevent this, Cristal Union Group undertakes to:

- Prohibit any employee from engaging in such partnerships or commercial relationships with partners whose rules of ethics do not match Cristal Union Group's code of conduct,
- Implement, based on a risk analysis, internal auditing activities with its customers, suppliers and partners in order to ensure that they are not involved in illegal activities or in those that Cristal Union Group would consider unacceptable,
- Prohibit any trade with countries entered on the list of embargoed countries and products,
- Prohibit any employee from receiving payments in kind on behalf of Cristal Union or one of its subsidiaries.

6. The Group's responsibilities to society

Representing the company and protecting the Group's image

The Group invites all employees to:

- Ensure that they do not tarnish or adversely affect the Group's image through any action or dissemination of information, written or spoken, which is contrary to the rules of this code of conduct. This obligation covers all types of media, including social media and electronic messaging systems.
- Alert their direct or nearest manager if they witness or become aware of any events which might adversely affect the Group's image.

Protecting the environment

Cristal Union Group has placed CSR at the heart of its corporate strategy since its creation in 2000. Reducing its environmental impact and protecting the environment are one of the pillars of this strategy and are considered a vector for sustainable growth.

Cristal Union undertakes to:

- Comply with environmental regulations,
- Assess its environmental impact and carry out lifecycle assessments of its products, within a program of continuous improvement,
- Apply a precautionary approach to problems linked to the environment,
- Develop strategies for reducing its environmental impact in order to contribute to a collective effort to reduce global warming,
- Identify and implement solutions aimed at adapting to the consequences of climate change.
- Develop its supplier list to ensure progressive compliance with the principles of its CSR policy.

If an employee should identify a potential risk to the environment from activities carried out by Cristal Union Group, that employee is required to report it to their manager and/or to the Group Ethics Manager.

A company committed to its local community

Cristal Union Group is a major economic player in the regions and territories where it operates and undertakes to:

- Participate in the economic dynamism of the rural areas in which it is present,
- Demonstrate and promote its values,
- Promote its adherence to the Global Compact and publish its 10 main principles with the aim of inspiring other stakeholders to commit to the same trajectory.

7. Whistleblower mechanism

Any employee who becomes aware of acts contrary to the law, regulations or the principles as defined in this code of conduct must alert the company.

The right to raise the alarm can be exercised at several levels:

- Firstly, by informing a direct superior,
- Secondly, if this line of communication is unsuitable, by informing the Group Ethics Manager directly via the email address: ethique@cristal-union.fr. Any reports will be treated as confidential.

A direct superior or, where applicable, the Group Ethics Manager may open an investigation and call in experts that are internal or external to the Group, if necessary. The principle of the presumption of innocence shall be respected. At the end of their investigation, the Group Ethics Manager shall send a note to the Group Human Resource Director. The latter shall then decide, along with the managers concerned, what action to take and any disciplinary sanctions to be applied.

The employee who raised the alarm shall benefit from legal protection and may not be subject to any punishment or any discriminatory measure or have their employment terminated, as long as they are acting in good faith, do not profit from raising the alarm and are not acting out of malice.

In accordance with the General Data Protection Regulation (GDPR), the person who is the target of the investigation may view and/or request the modification or deletion of any personal data which may have been collected during the investigation.

8. Disciplinary sanctions

Failure to comply with this code of conduct by employees may give rise to disciplinary sanctions and, where appropriate, legal proceedings or criminal prosecution.

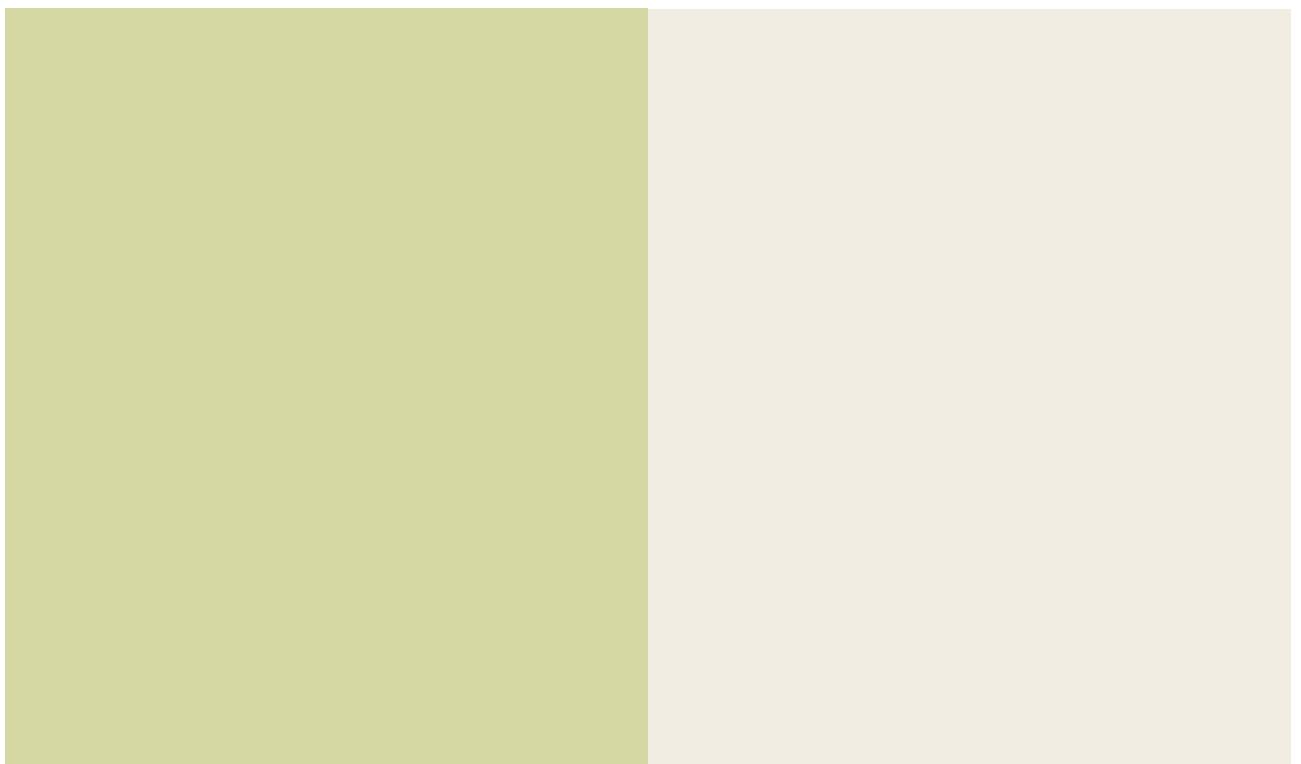
9. Contacts

Group Ethics Manager:

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