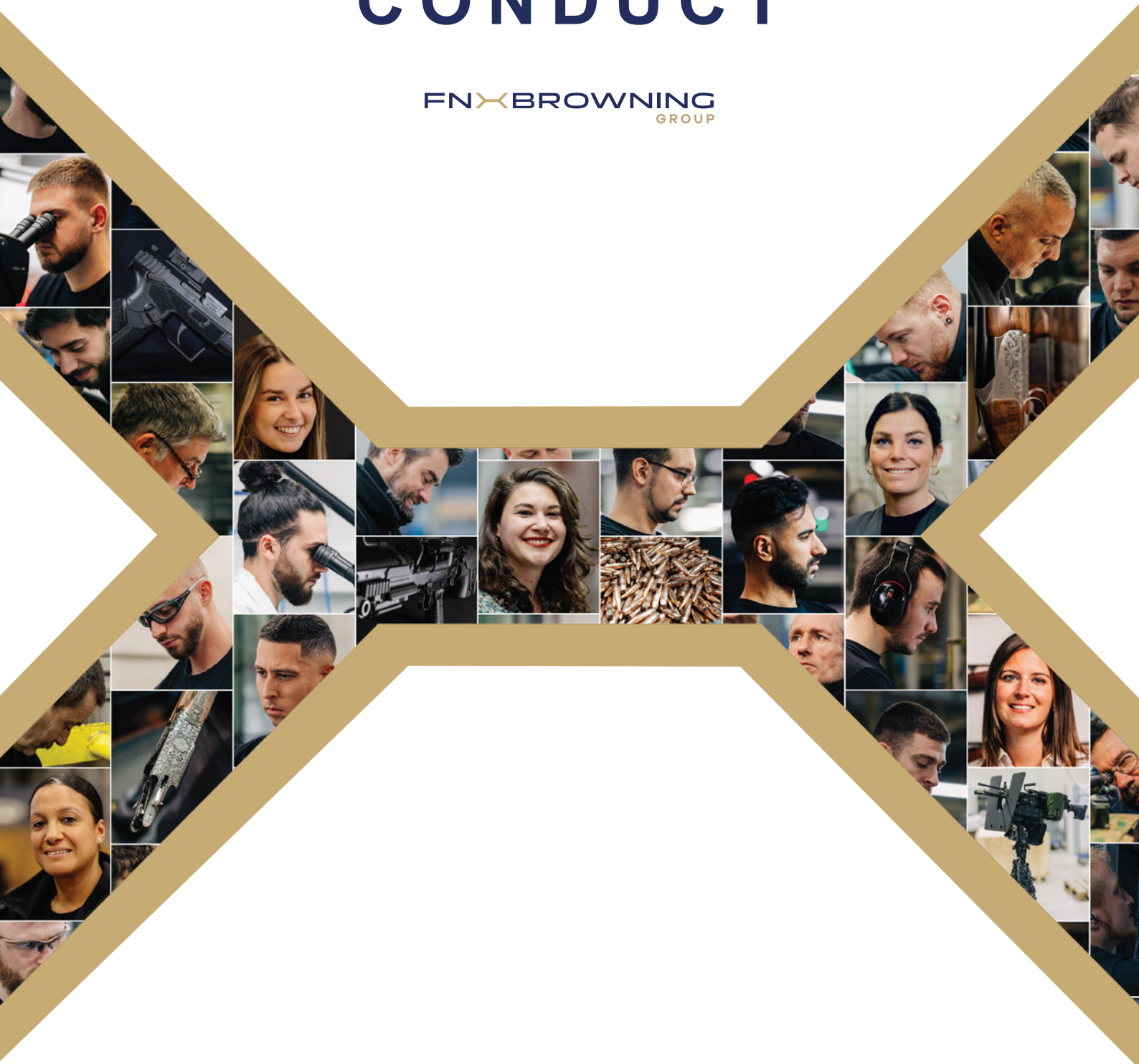


CODE OF CONDUCT

FN  BROWNING
GROUP



DRIVING LEADING BRANDS



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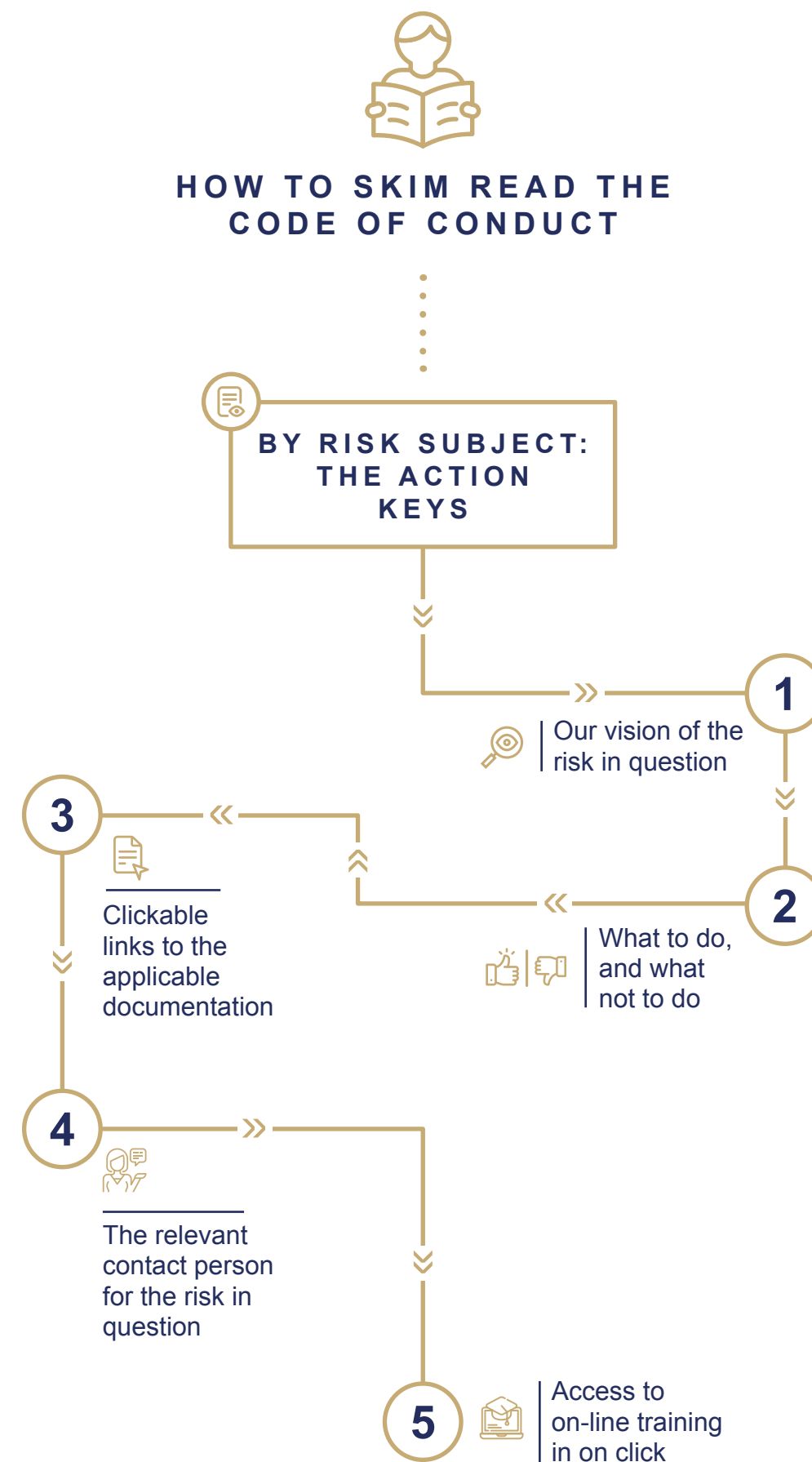
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“ I N A C T I O N ”

Our Code of Conduct forms the **backbone** of our **compliance programme**. It represents a toolbox, which provides us **the keys to a better understanding of compliance risks** which can arise in our every-day work. For each risk identified, it presents our **commitment**, some **concrete examples to follow or not**, clickable links to the **applicable documentation**, and **contact persons and awareness modules**, so you know how to react in practice.





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1.1.

A WORD FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS AND THE CEO

“ The Code of Conduct of FN Browning Group embodies the values which unite us, the principles which inspire us, and the rules which protect us. This code shows our vision for managing the risks of the Group, its branches and its entire staff.

This Code

We are fully committed to the attainment of excellence, and to upholding the highest standards, not only in our products and services, but also in our governance.

We are convinced that the long-term success of our organisation is dependent upon on multiple factors. In this way, the innovation, reliability and safety of our products and services go hand and hand with the rigorous respect of our strong values, of our Ethical Charter, of our commitment to sustainable development, of our compliance policies, of our responsible management of human resources, and of our commitment to our social, financial and industrial ecosystem.

Our Code of Conduct is designed to guide our decisions, and the way in which we carry out our activities. It applies to all of our branches and staff members, collectively and individually, and bears witness of our commitment to act with integrity, responsibility and respect.

Our Code of Conduct demonstrates, to all of our stakeholders, our commitment to be a responsible organisation, which is aware of its impact, is proud of its choices, and honours its commitments.”

Yves Prete & Julien Compère

1.2. OUR GOVERNANCE

We view the governance of our Group as a structured set of standards relating to control, administration, management and the obligation to give account. It is intended to organise the management structures and the decision-making processes of our Group, in an efficient, objective and transparent manner.

Our governance is designed to integrate risk management at the heart of our operation, so that it forms part of our organisation's DNA.

It is mainly characterised by the following elements:

- » The parent company, FN Browning Group, is based at Herstal, in the Walloon Region (Belgium).
- » Rooted in its local ecosystem, the Group operates on a global level, with sites in Europe and the United States.
- » It is 100% owned by '**Wallonie Entrepreneurs**', an economic and financial tool of the Walloon Region.
- » The parent company of our Group has a Board of directors with the power to perform all acts which are necessary or useful to achieve the Group's aims, in compliance with its internal regulations.
- » The board of directors relies on several specialist committees, in particular, an audit and risk management committee, and a remunerations and appointments committee.
- » Our Group also has an independent, internal audit department, whose task is to provide reasonable assurance of the effectiveness of the internal control, - i.e. proper mastery of the procedures and the organisation of the Group -, in an objective manner.
- » Finally, a **supervisory board member (external auditor)** is charged with auditing the financial situation of the Group, its annual accounts, and the lawfulness of the transactions entered in the accounts.

The main aspects of our Group's governance – in particular, its structure, composition, and the role of its bodies – are shown in more detail on our [website](#).





1.3. OUR VALUES

We have adopted **values** shared by all of our branches and workers. These values, “To be a leader, Together, with Commitment and Trust” convey a mindset that is resolutely human and forward facing.



TO BE A LEADER

To lead through the excellence of our products, services and persons for the satisfaction of our clients; to dare to create and innovate; to manage our company with agility and efficiency while respecting the environment and long-term, sustainable development through quality and innovation.



TOGETHER

To integrate varied profiles and diverse experience, to stimulate communication, collaboration and success as a team, and to create value, while respecting the diversity, role and contribution of each person.



COMMITMENT

To distinguish ourselves by our passion, enthusiasm and will; to build on our heritage and traditions while promoting a long-term future; to become fully involved in order to satisfy our clients throughout the world.



TRUST

To implement standards in compliance with our Ethical Charter, and standards of integrity in our business; to build solid relationships based on trust; to treat everyone with great respect.

Moreover, these four values are accompanied by the precise concrete behaviour expected of all workers of the Group and its branches, in particular, exemplarity, the sharing of information and ideas, listening to others and communication, internal dissemination of good practice, respect for all, the manner in which new colleagues are welcomed, continuous improvement, the honouring of commitments, and even the taking of responsibility.

1.4.

OUR ETHICAL CHARTER

We share a common **Ethical Charter** with all of our branches throughout the world. This outlines values which also serve as guidelines which permit staff to behave in an ethical manner in the context of their positions.

The charter defines the Group’s commitment to leading its activities with integrity, and to promoting best governance practices in all sectors of its activity. It is structured around four central themes:



RESPECT

The charter defines what is expected of all staff members in terms of respect. The subjects discussed recall the importance that the Group attaches to non-discrimination and fair and equitable treatment, the combatting of harassment, quality of life in the workplace, confidentiality, and even to specific bans such as on the use of drugs.



INTEGRITY

Integrity is about loyalty to the Group and its companies. The charter therefore calls on persons to work with care and discernment, in an impartial manner, and in the interest of the company. Aside from the combatting of conflicts of interest, it also recalls the necessity for all to take part in protecting the property of the Group and confidentiality.



LEGALITY

Wherever the Group and its branches operate, members of staff are obliged to respect the laws and regulations in force. This also includes, amongst others, labour legislation and the legislation governing business, exports, transport, competition, the combatting of corruption and money laundering, and even intellectual property rights.



COMMUNITY

The Group and its entities form part of their communities. The charter recalls the necessity to implement strategies regarding the environment, social responsibility and governance. It tackles promotion of the Group’s heritage managed by the ‘Ars Mechanica Foundation’, and the possibility to support associations forming part of the ecosystem.



1.5.

OUR ESG STRATEGY

Our ESG (Environmental, Social and Governance) strategy expresses our commitment to operating in a responsible and sustainable manner while promoting positive impacts on the environment, the company and our stakeholders. Here are our ESG commitments, in brief:

ENVIRONMENTAL RESPONSIBILITY

- >> To reduce our greenhouse gas emissions and our energy consumption.
- >> To manage our waste and our resources in a responsible manner.
- >> To promote sustainable practices in our entire operations and supply chain.

SOCIAL RESPONSIBILITY

- >> To provide safe, non-discriminatory work places.
- >> To support the well-being and development of our staff members.
- >> To get involved in meaningful community projects.

EXCELLENCE IN GOVERNANCE

- >> To act with integrity and transparency in all of our decisions.
- >> To ensure respect of the laws, regulations and standards of our Ethical Charter.
- >> To encourage the taking of responsibility, on all levels of the organisation.

Each individual person in our Group has a role to play in the achievement our ESG aims. Whether by promoting safety at work, acting in compliance with our Ethical Charter, or reducing our waste, - your actions make the difference. Together, we can create a sustainable and responsible future for our Group, and the communities that surround us.



1.6.

A CODE OF CONDUCT -
WHO FOR?

Our Code of Conduct applies to all levels of our Group, from the production lines to the board of directors, and in all aspects of our operations.

It is compulsory for each one of us, including manual labourers, employees and executives, regardless of their post, their years of service, their responsibilities and their locality.

Our Code of Conduct lays down high standards which we strive to respect throughout our value chain, including subcontractors, clients, suppliers and partners.

By making our Code of Conduct accessible to the public, we encourage our stakeholders to respect similar standards, thereby promoting a virtuous circle of ethical practices.

1.7.

A CODE OF CONDUCT -
WHY?

Our Code of Conduct is designed to help us understand our commitment to operating in a responsible manner.

It is based around three main themes, which themselves are subdivided into sub-themes supported by key principles and practical examples, and links to the applicable documents and contact persons (Compliance Ambassadors).

Although our Code of Conduct is based on principles without targeting specific situations, it provides us the necessary tools to manage individual cases in an effective manner. In the case of any doubt, we urge you to seek advice of your manager, Compliance Officer or the relevant Compliance Ambassadors designated for that subject.



1.8.

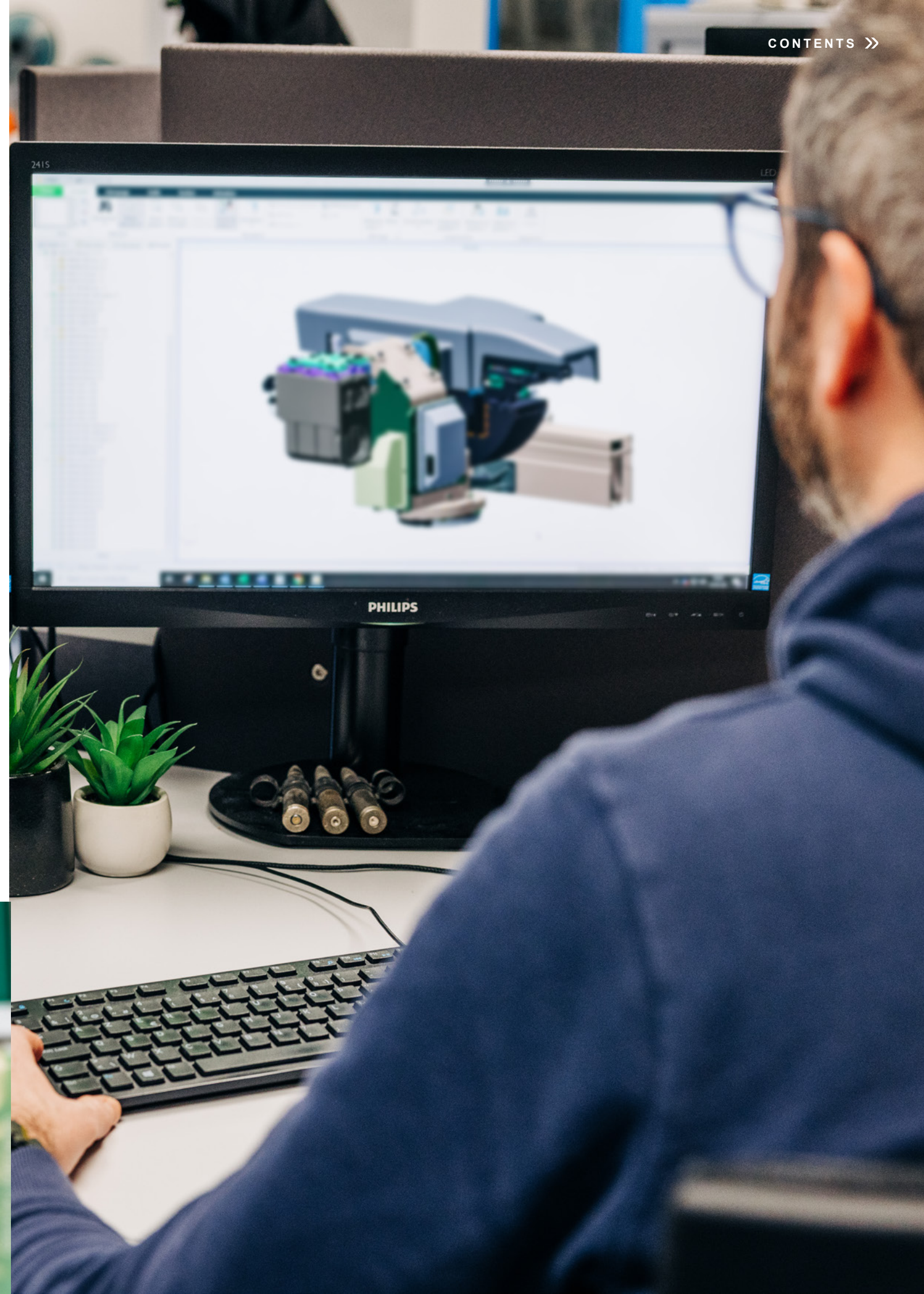
COMPLIANCE AND THE TASK OF THE COMPLIANCE OFFICER

Compliance means abiding by the laws, regulations, company/internal policies and the standards of our Ethical Charter, in all aspects of our activities. It guarantees responsible, transparent and honest management of our operations. Compliance is not just about following rules, it also involves instilling trust, protecting our reputation, and promoting a culture of responsibility.

The task of the Compliance Officer is to ensure that our Group respects its ethical and legal obligations. His responsibilities include, in particular:

- » Implementing the ethical standards laid down in the Group's Code of Conduct
- » Providing support and advice
- » Creating awareness
- » Ensuring proper implementation of the Code of Conduct
- » Promoting a culture of free speech

Nevertheless, compliance is a shared responsibility. Each staff member contributes to the respect of these standards, regardless of his/her role. By understanding and respecting our Code of Conduct, you help protect our Group and its values. If you have a query concerning a decision or situation, the Compliance Officer is there to help you, at address complianceofficer@fnbrowninggroup.com.



1.9. A NETWORK OF COMPLIANCE AMBASSADORS

Our **network of compliance ambassadors** is a group of committed staff members, who act as an example of ethics and compliance within our Group and its different entities. They are primarily resource persons at our different local entities. They help to promote our Code of Conduct, and ensure that compliance is a priority in each part of our operations.

This network strengthens our organisation by:

- » Guaranteeing that compliance is integrated at all levels of our daily operations.
- » Promoting open dialogue on ethics and integrity.
- » Creating a reliable support system for any staff members who may have questions or concerns.

If you have questions concerning the Code of Conduct, need advice, or wish to report a problem, your local compliance advisor is there to assist you. He is trained to provide you with guidance, or direct you to the appropriate resources.

Together, - with the support of our ambassadors -, we can respect our commitment to ethical excellence, and build a stronger, and more responsible, organisation.





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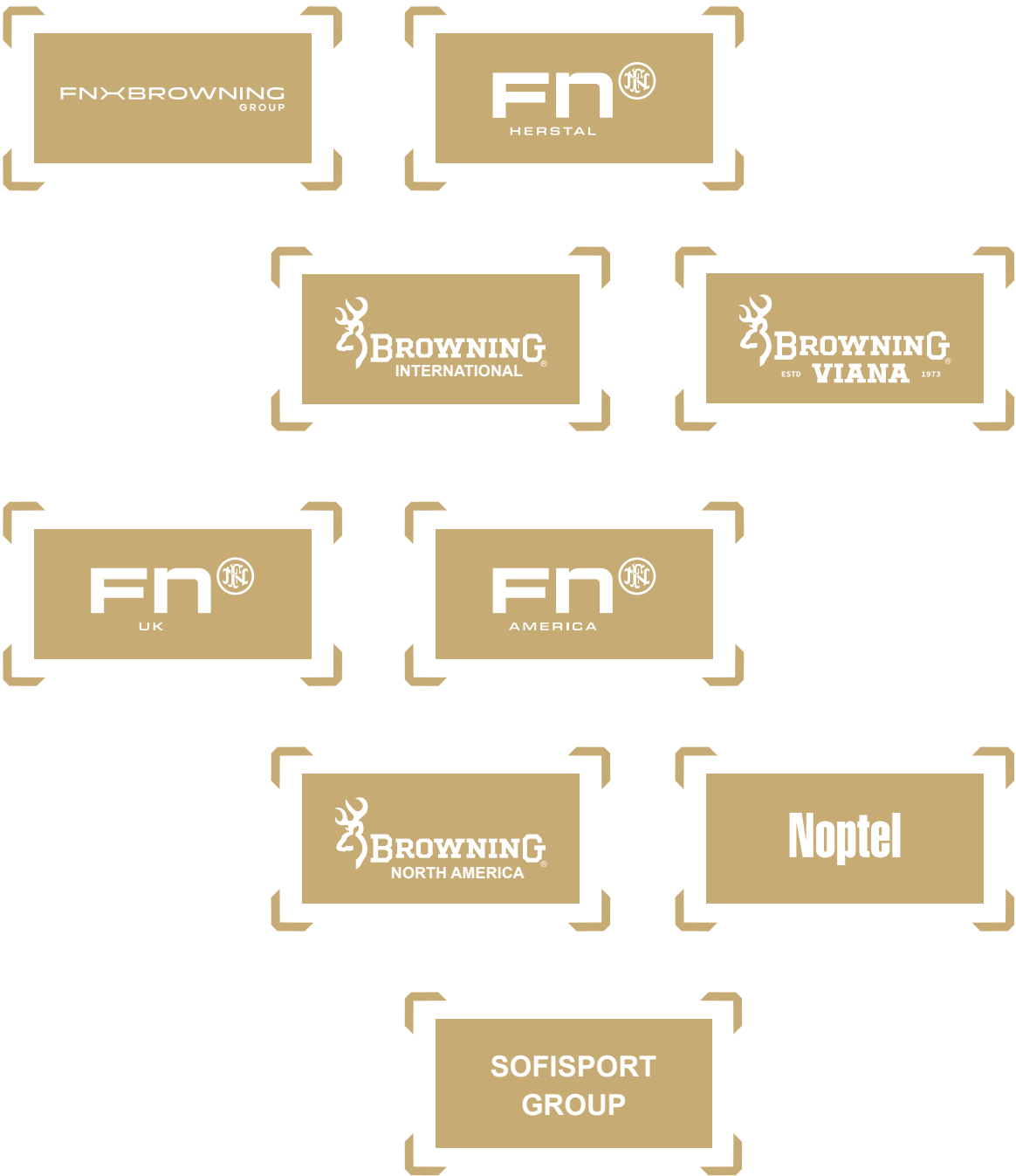
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CONSULT THE
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Simply click on the entity
of your choice. ▶



For any questions, please contact the HR Department or
your **compliance ambassador**.



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2.1.
LEADERSHIP
AND EXEMPLARITY

We count on our managers to play a vital role in defining behaviour compliant with our Ethical Charter, within the organisation. Our Leaders exist at every level of the organisation, they manage teams, and strive to build team work on a daily basis. We trust our Leaders to provide an example, to promote a culture of integrity, and to hold themselves - and their teams - responsible for respect of the Group's values.

LET'S ACT TOGETHER



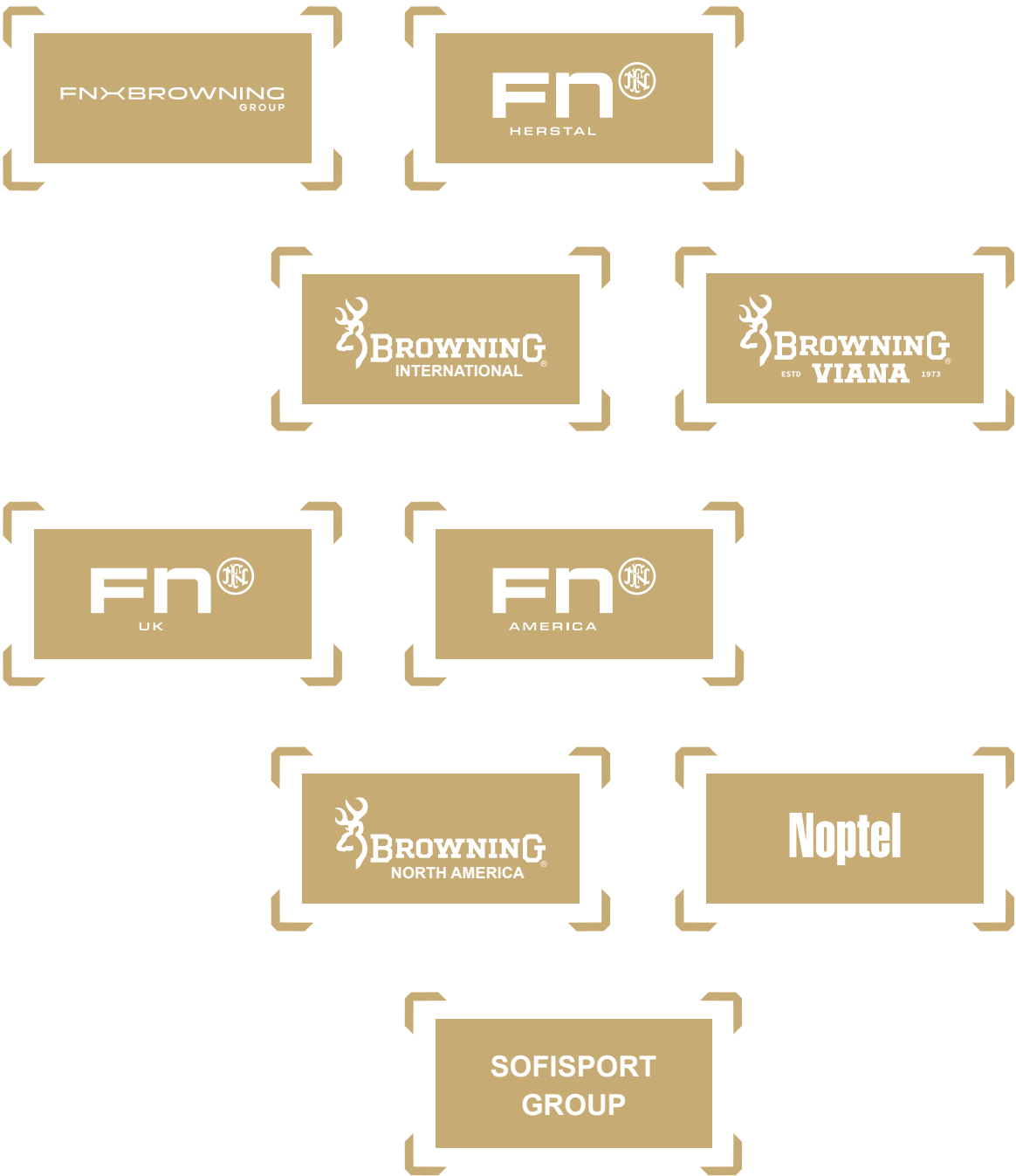
- >> Provide an example by respecting our ethical practices, and by scrupulously following company rules and policies.
- >> Encourage open communication, listen to the concerns of your team, but also ensure that they gain a sense of responsibility.
- >> Recognise and encourage ethical behaviour in the team.



- >> Ignore or minimise behaviours within the team which breach our ethical standards.
- >> Display favouritism or partiality when taking decisions.
- >> Close your eyes to situations of conflict of interest, or make biased decisions which risk creating a lack of trust.

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For any questions, please contact the HR Department or
your **compliance ambassador**.



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2.2.
NON-DISCRIMINATION
PRINCIPLE

We are committed to operating a zero tolerance policy with regard to discrimination, harassment, and any behaviour which injures the dignity of an individual person, and we have put solid mechanisms and tools in place to protect our staff members from these risks. Moreover, our manner of conducting business includes robust duty of vigilance processes, which guarantee that we only work with suppliers or clients who share these commitments, in particular, our Code of Conduct for Business Partners.

LET’S ACT TOGETHER



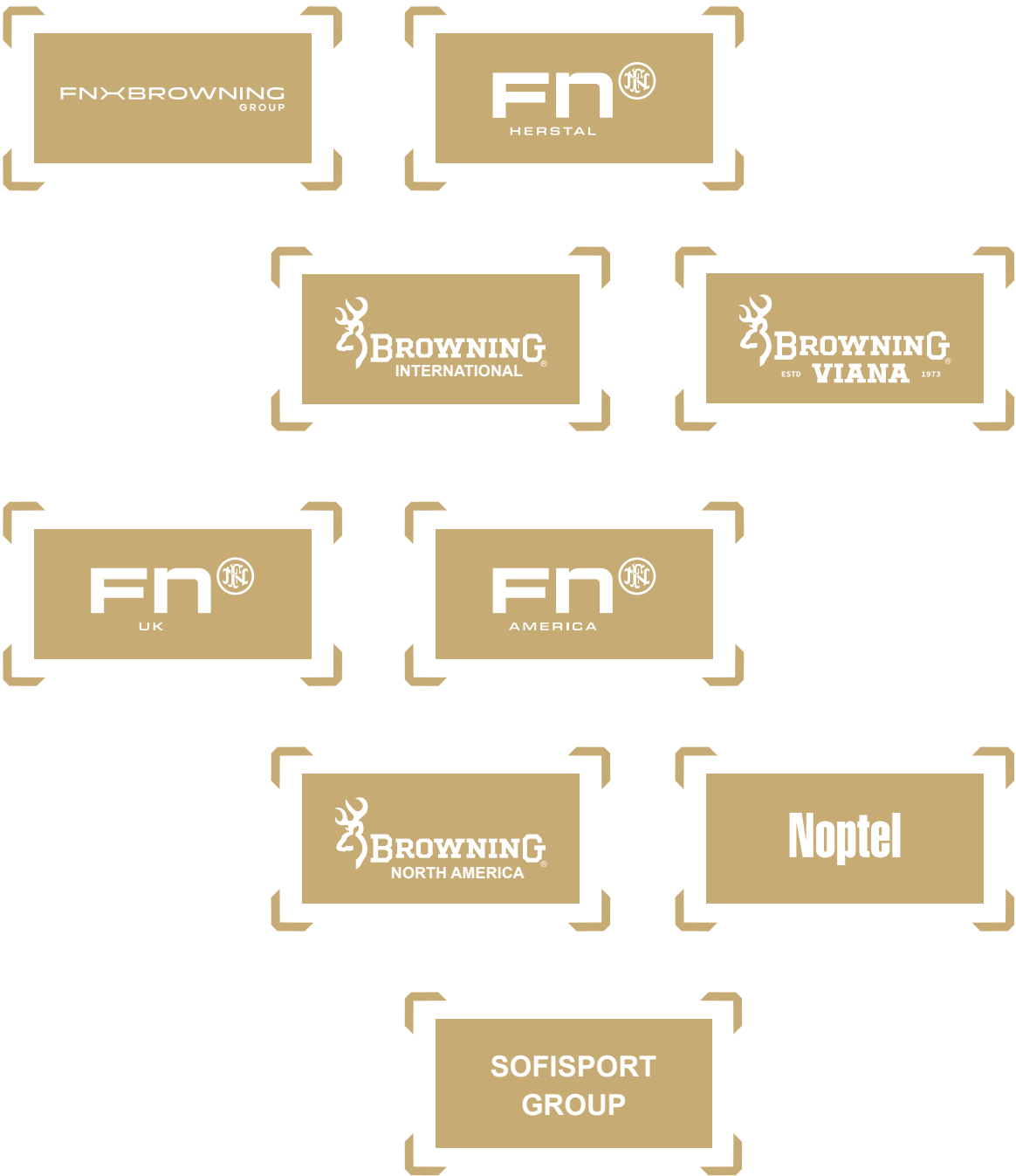
- » Treat all colleagues and stakeholders with respect and dignity.
- » Report each case of harassment or discrimination.
- » Ensure that hiring and promotions are based on merit.



- » Tolerate any form of harassment, intimidation or discriminatory behaviour.
- » Base decisions regarding hiring, on race, gender, religion or other factors not linked to merit.
- » Ignore complaints regarding violations of human rights.

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of your choice. ➤



For any questions, please contact the HR Department or
your compliance ambassador.



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2.3. INCLUSION AND DIVERSITY

We are committed to guaranteeing a workplace where everyone feels valued, respected and authorised to give the best of themselves. We encourage inclusion and diversity to recruit, retain and promote persons of diverse backgrounds, - including but not limited to -, race, gender, age, ethnic origin, religion, sexual orientation, and skills. We also ensure that our employees, of any level in the hierarchy, are able to develop within the Group and acquire new skills. Finally, we guarantee fair and equitable treatment and equal opportunities for all staff members, by ensuring that decisions are based on merit and completely unbiased.

LET’S ACT TOGETHER



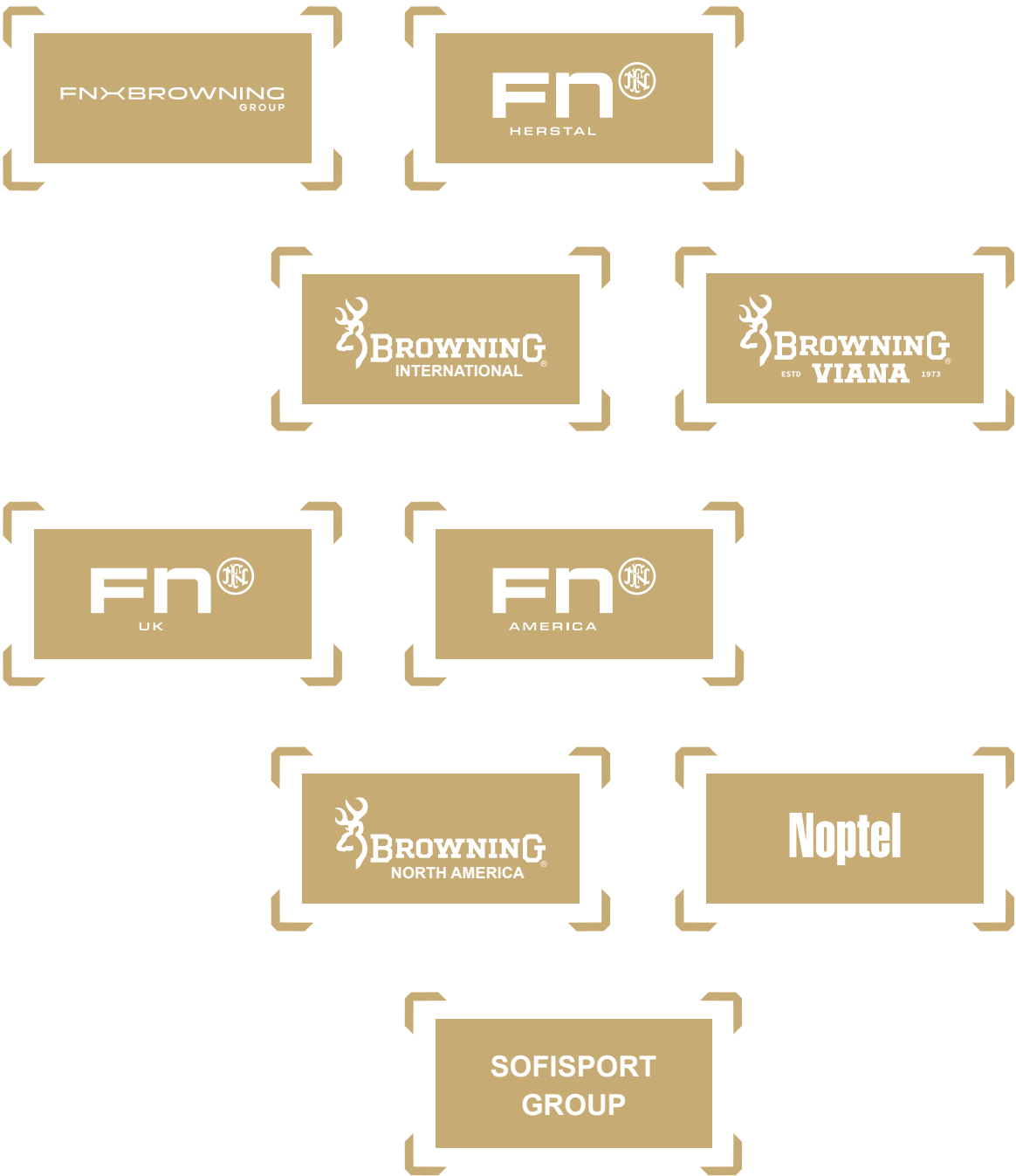
- » Encourage different points of view in team discussions and decision-making.
- » Take part in training programmes for the combatting of discrimination.
- » Ensure diverse representation in teams and leadership.



- » Make assumptions regarding the skills or preferences of a person, based on stereotypes.
- » Exclude individuals from opportunities, due to differences in origin or viewpoints.
- » Fail to listen to the concerns of staff members regarding inclusion.

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 For any questions, please contact the HR Department or
your compliance ambassador.

2.4.
SOCIAL
RELATIONSHIPS

We are committed to promoting a respectful, fair and collaborative relationship between staff members and the organisation. We reaffirm our commitment to respecting the right of staff members to join a trade union and take part in collective negotiations, in compliance with local laws and international labour standards. We are committed to guaranteeing fair salaries, reasonable working hours, and safe working conditions for all staff members, and we support open and transparent dialogue between staff members and management.

LET’S ACT TOGETHER



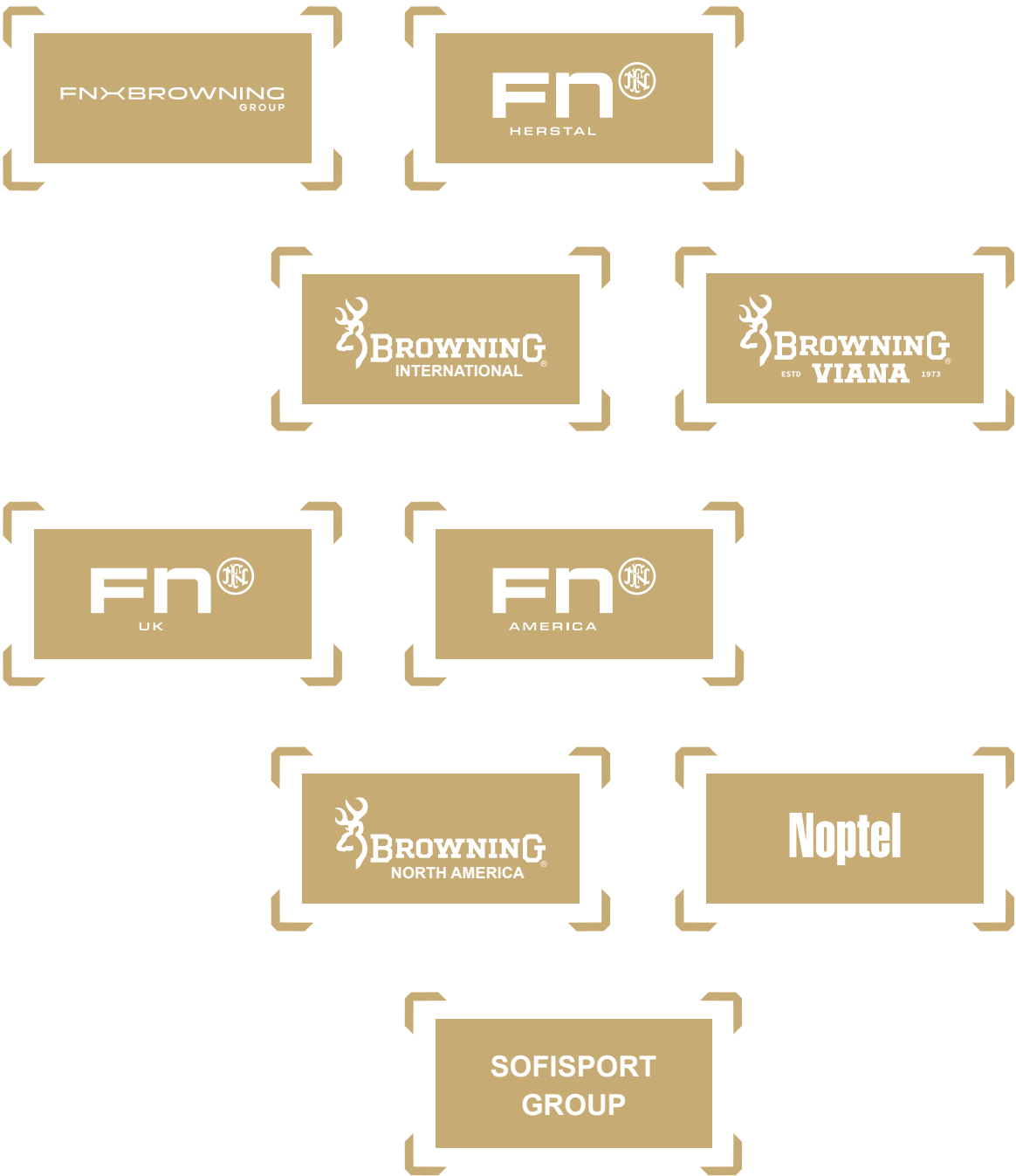
- » Promote regular dialogue with staff members, to respond to concerns and improve labour relations.
- » Encourage cooperation and teamwork, by promoting collaborative initiatives which strengthen mutual assistance and collective engagement.
- » Respect the right of staff members to join a union or take part in collective negotiations.



- » Take reprisals against staff members who have raised grievances or joined a union.
- » Tolerate disrespectful behaviour.
- » Ignore comments or concerns raised by staff members.

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Please contact the SIPP for any further questions or **your compliance ambassador**.



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2.5. HEALTH & SAFETY

In view of our industrial activities, we are committed to upholding strict health and safety measures. We ensure that all staff members work in environments which meet or exceed our industrial safety standards, such as the standards linked to the handling of hazardous materials, explosives and heavy machinery. To this end, we offer regular training on safety protocols, emergency procedures and the proper handling of sensitive materials. We invest in advanced safety equipment and technologies to protect our staff members. We strive to lay down clear procedures for reporting and responding to accidents and incidents, and we promote a culture in which safety issues can be raised at any time.

LET’S ACT TOGETHER



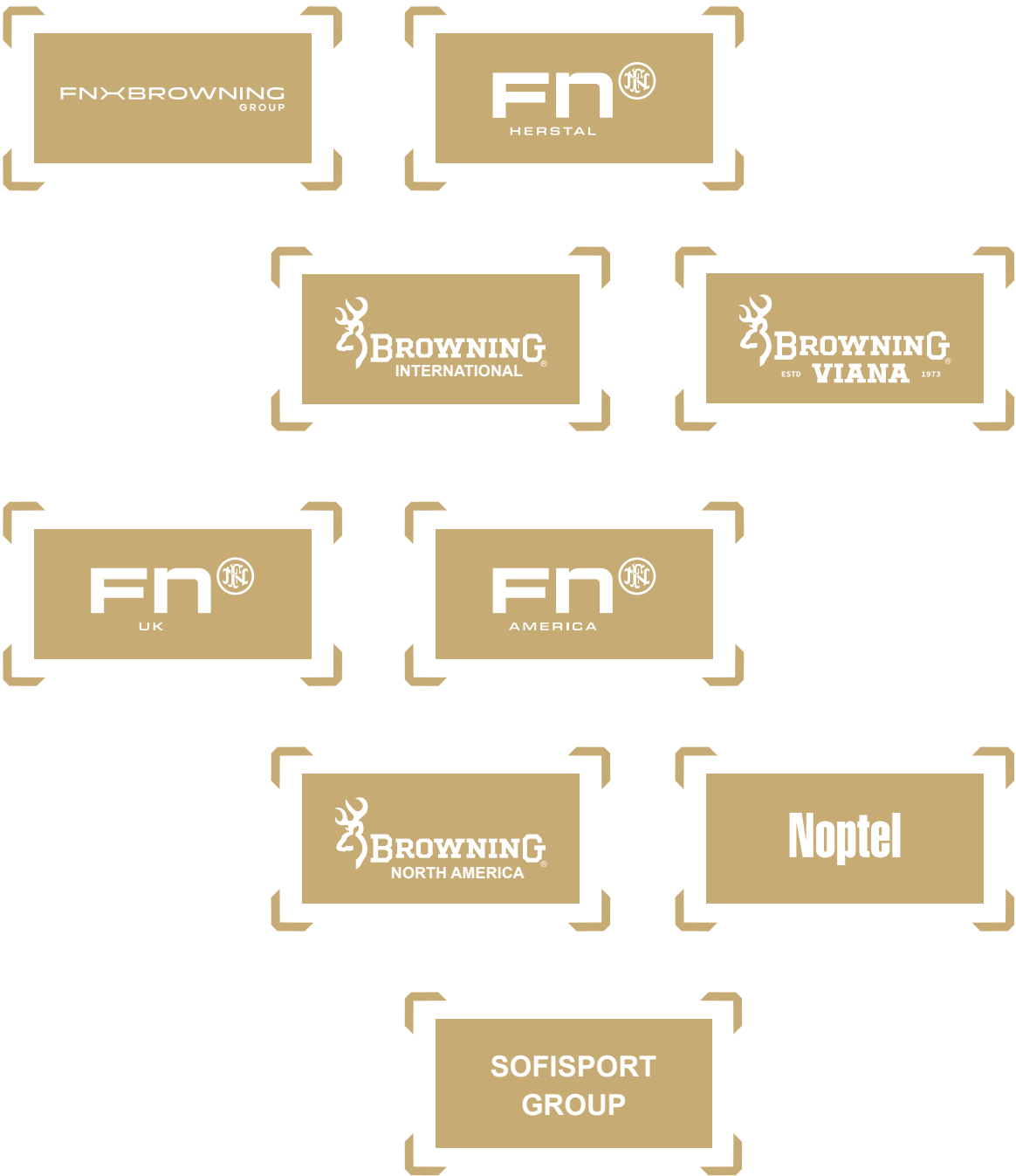
- >> Follow all safety protocols, in particular, when handling hazardous materials or operating machinery.
- >> Report immediately every safety issue, accident or incident.
- >> Use personal protection equipment (PPE) as needed, and encourage others to do the same.



- >> Override safety measures in order to save time or money.
- >> Ignore safety warnings or neglect the maintenance of safety equipment.
- >> Engage in careless behaviour which puts you or others at risk.

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of your choice. ▶



Please contact the Communication Department for any further questions or
your compliance ambassador.

2.6. OUR COMMUNITY

We are aware of our responsibility to have a positive impact on the communities, namely the ecosystems, in which each of operating sites develops. We have numerous programmes which support education, skills development, and community infrastructure, in zones where the Group operates. We are known for our commitment to recruitment, to training local talent, and to working with local suppliers, - in particular, in the communities close to our operating sites -, in order to promote economic growth and local stability. We are also committed to supporting culture via our Foundation ARS MECHANICA.

LET'S ACT TOGETHER



- >> Prioritise our local community when choosing a new supplier.
- >> Establish partnerships, by supporting an education programme, an innovative solution, or cultural initiatives.
- >> Respect the local culture of our entities throughout the world.



- >> Engage in activities which could harm the environment or the well-being of our community.
- >> Ignore concerns of the community relating to our operations.
- >> Choose suppliers which are based far away from the place where we operate, and which supply products which a local supplier could supply.



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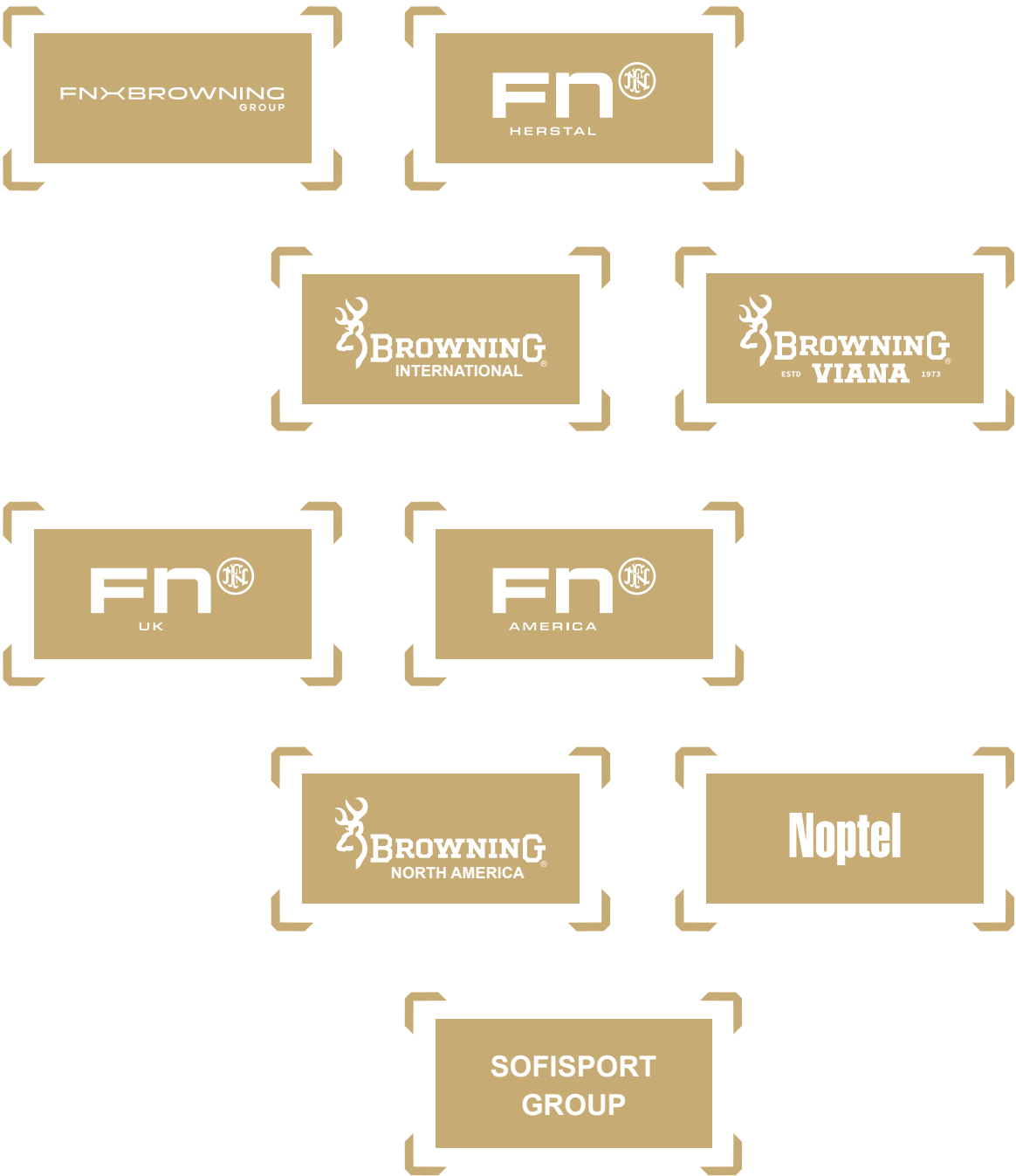
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Please contact the Export Control Department for any further questions or
your **compliance ambassador**.



E-learning through access to our KnowBe4 platform

3.1.
EXPORT CONTROL
AND SANCTIONS

We comply with the applicable laws and regulations governing export controls and sanctions by: 1. guaranteeing that our products, services and technologies are not exported (to) or shared with countries, entities or individuals which are subject to export restrictions; 2. verifying the end use and end users of our goods and services, by means of rigorous duty of vigilance processes.

LET’S ACT TOGETHER



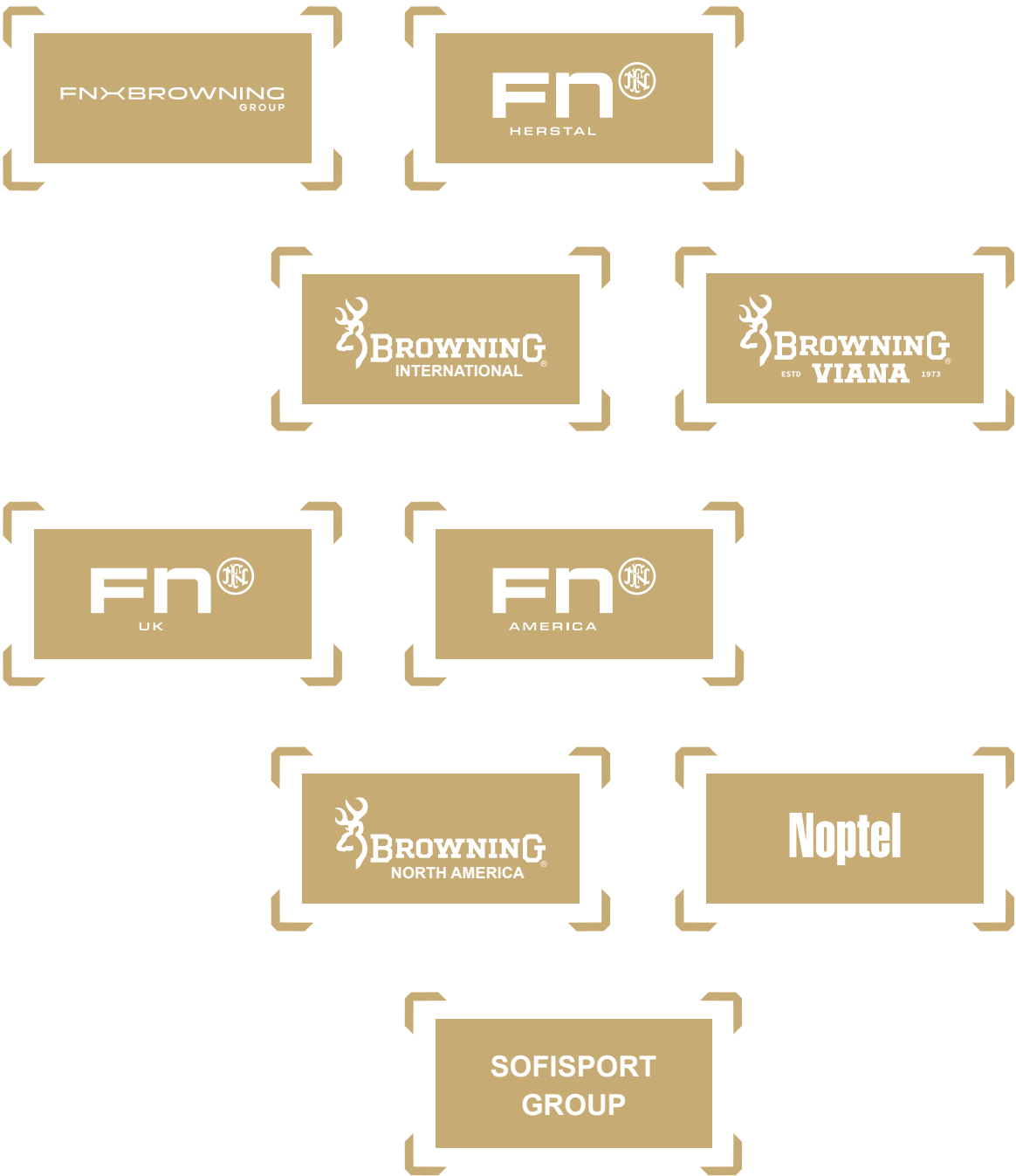
- » Exercise an in-depth duty of vigilance in order to guarantee respect of international business laws and sanctions.
- » Obtain all necessary export licences before dispatching/sending products which are subject to export controls.
- » Raise employees’ awareness of export control regulations, and the consequences of failure to respect them.



- » Dispatch/send products or technologies in the context of a sale or demonstration, without a valid export license.
- » Ignore alarm signals linked to export activities, such as unusual dispatch itineraries or surprising requests from clients.
- » Provide incomplete or incorrect information when addressing your request to the department responsible for submitting license requests.

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Please contact the Compliance Officer or the Legal Department for any
further questions or **your compliance ambassador**.



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3.2.
ANTI-CORRUPTION
GIFTS AND HOSPITALITY

We respect the applicable laws and regulations governing the combatting of corruption, and we operate a zero tolerance policy to corruption of any form. As a Group, and as individuals, we do not offer, give or accept bribes or inappropriate payments in order to obtain business advantages, and we keep an accurate and transparent record of all transactions.

LET’S ACT TOGETHER



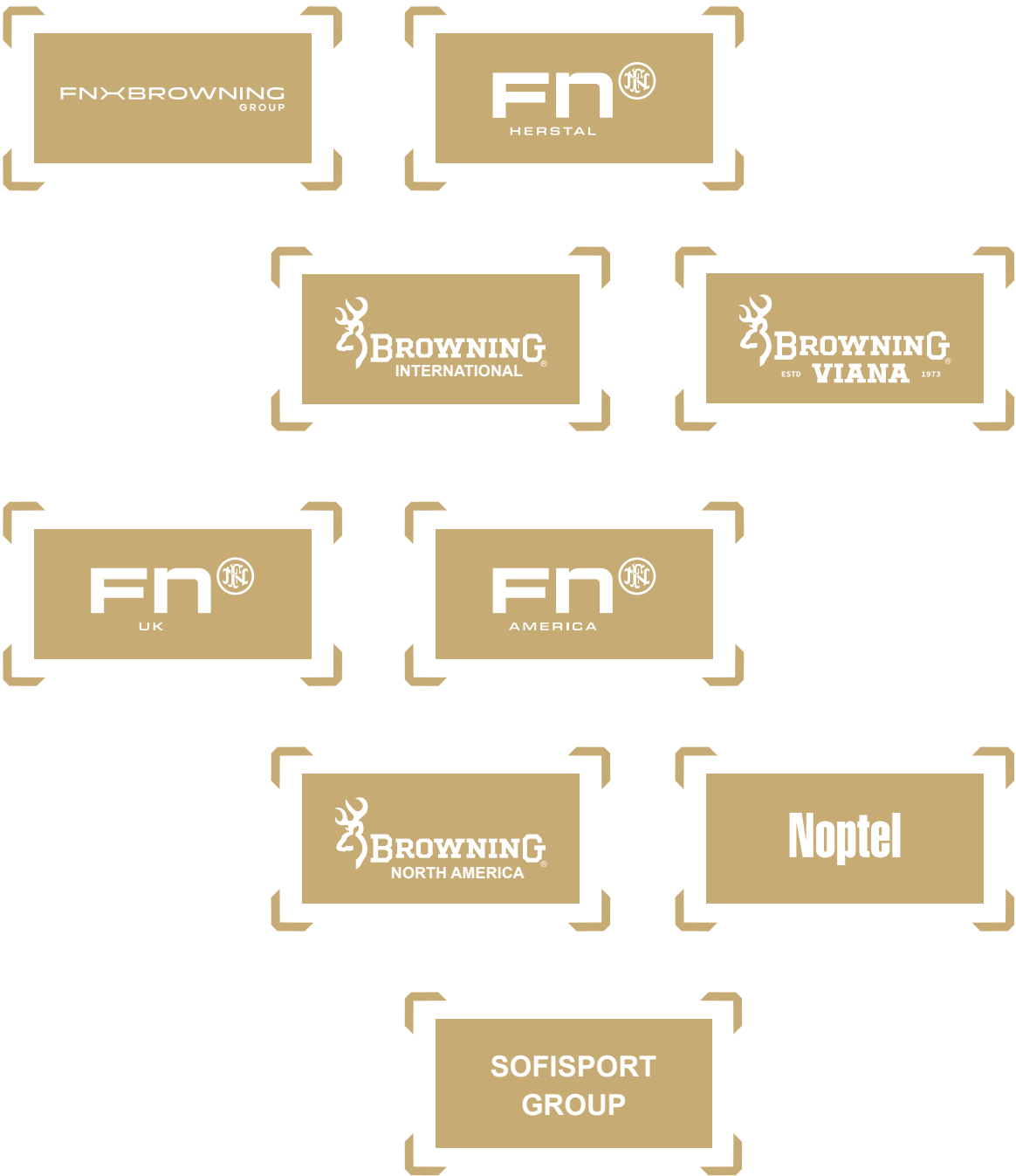
- » Report every request for bribes or inappropriate payments, to the Compliance Officer, or via the **Integrity Line**.
- » Declare all of your gifts and hospitality using the dedicated platform.
- » Follow our Group policy to avoid any breach of the applicable laws and regulations governing the combatting of corruption, and gifts and hospitality.



- » Offer or accept bribes, secret commission, or other illicit payments for the obtaining of business advantages.
- » Use gifts or expressions of hospitality to influence decisions or obtain favours in an inappropriate manner.
- » Ignore suspicious activities or payments in business transactions.

CONSULT THE APPLICABLE DOCUMENTATION

Simply click on the entity
of your choice. ➤



Please contact the Compliance Officer or the Legal Department for any further questions or **your compliance ambassador**.



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3.3. ANTI-MONEY LAUNDERING AND THE FINANCING OF TERRORISM

We respect the applicable laws and regulations governing the combatting of money laundering, and we are committed to preventing use of our company for the purposes of money laundering or the financing of terrorism. Consequently, we perform in-depth checking of clients, suppliers and other business partners. We also monitor financial transactions for any unusual or suspicious activity.

LET’S ACT TOGETHER



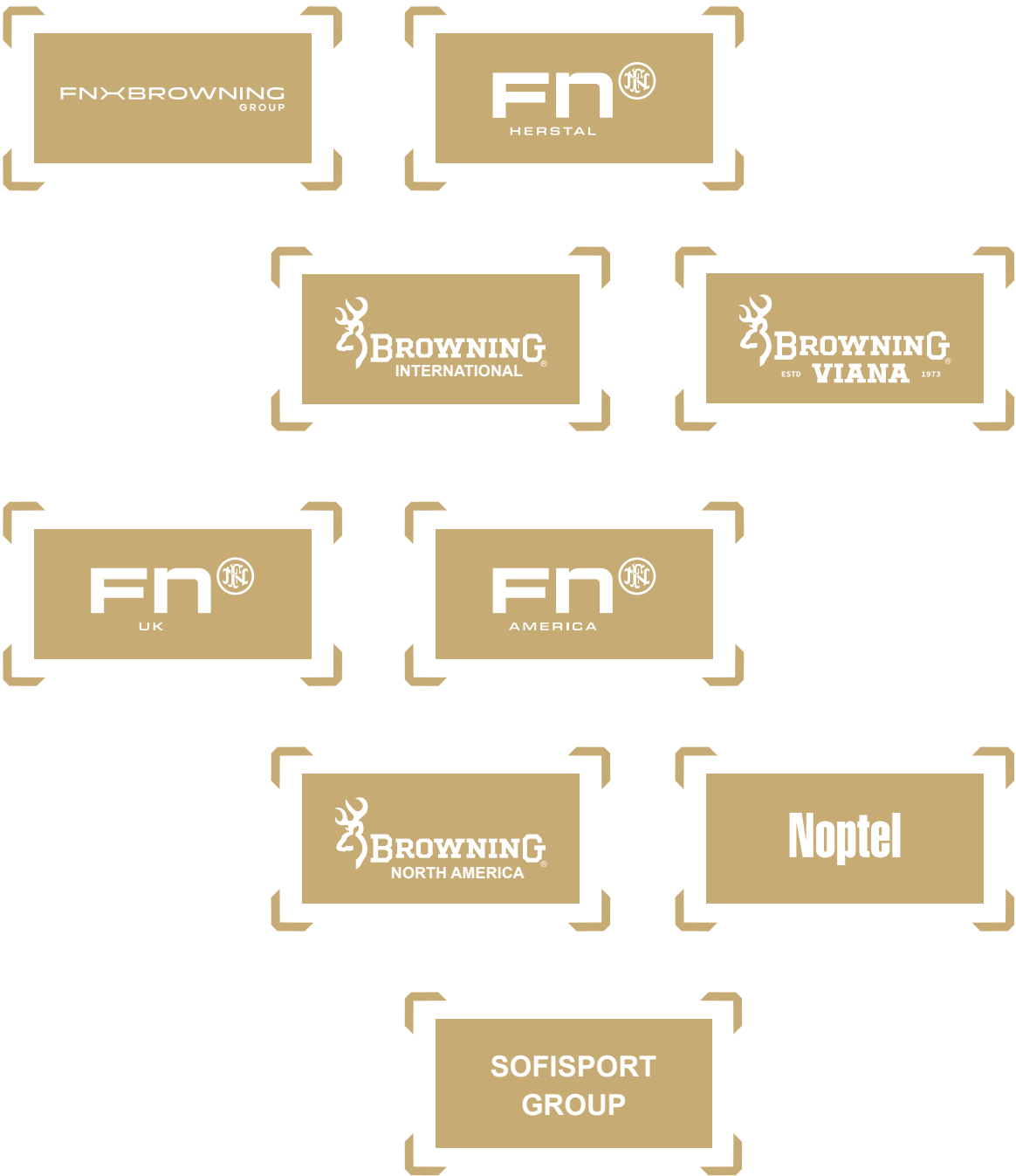
- » Check the identity (including bank details) of clients, suppliers and other business partners, to ensure they are legitimate.
- » Quickly report any suspicious financial activity to the authorities.
- » Follow our Group policy in order to avoid any breach of the applicable laws and regulations governing the combatting of money laundering.



- » Accept payments originating from unknown or unverified sources.
- » Close your eyes to a transaction which seems suspicious to you.
- » Ignore compliance procedures relating to the duty of vigilance.

CONSULT THE
APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Compliance Officer or the Legal Department for any
further questions or **your compliance ambassador**.

3.4.
DUTY OF VIGILANCE OF
OUR STAKEHOLDERS

We apply high duty of vigilance standards before entering into a business relationship, as our reputation depends on the integrity of the persons with whom we do business. Therefore, we perform very in-depth checks on all of our business stakeholders, - including but not limited to - agents, clients and suppliers. Once we have decided to enter into a business relationship, we request our stakeholder to abide by our Code of Conduct for business stakeholders.

LET’S ACT TOGETHER



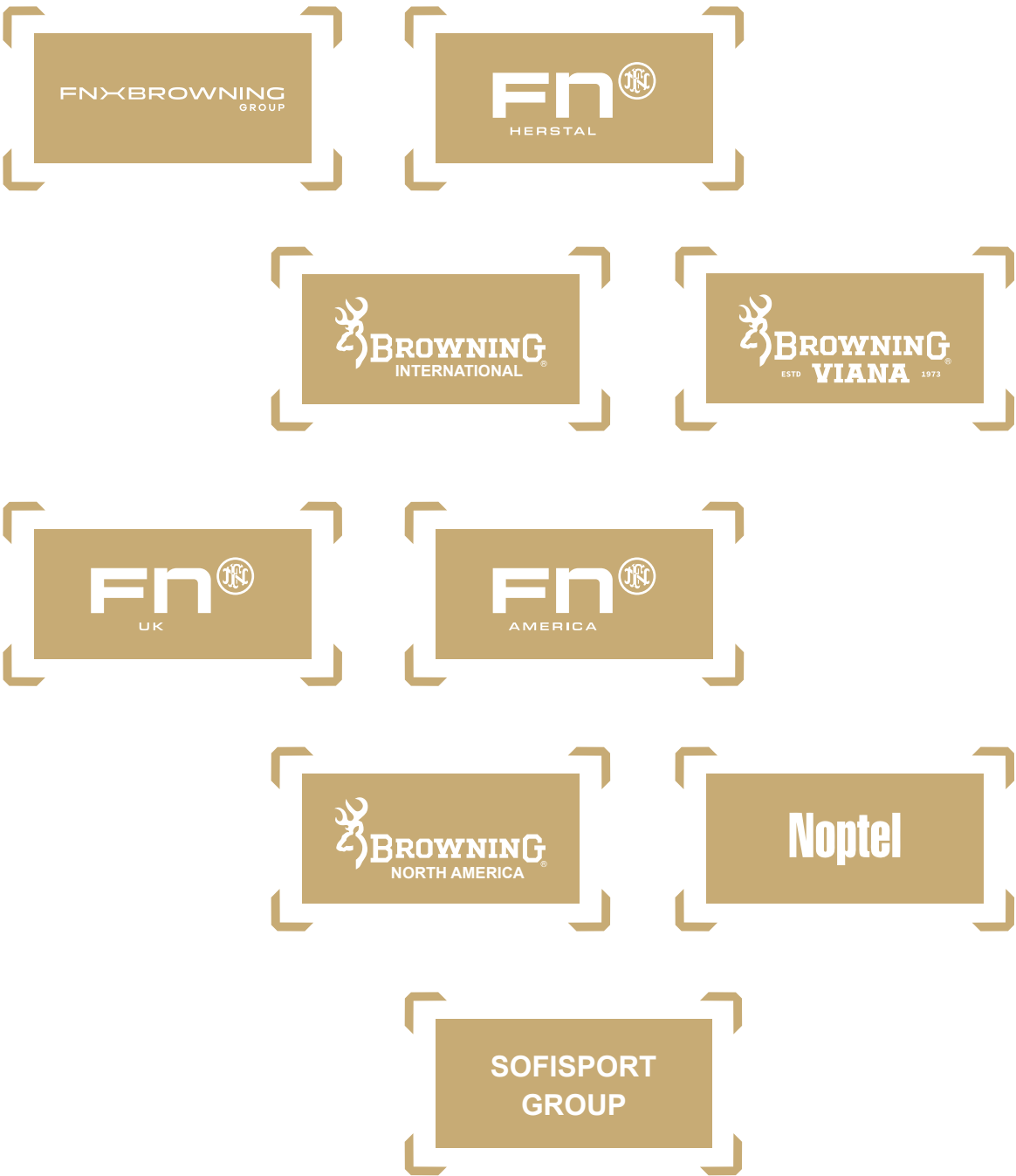
- » Perform in-depth checks on the past history of third parties, before entering into a business relationship.
- » Ensure that contracts with third parties include clauses regarding the respect of laws and ethical standards.
- » Follow Group policy in order to manage correctly the duty of vigilance of our stakeholders.



- » Enter into relationships with third parties which do not respect the company’s standards of compliance and ethics.
- » Ignore early signs of unethical or illegal conduct of third parties.
- » Delegate responsibilities to third parties without clear supervision and responsibility.

CONSULT THE
APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Compliance Officer or the Legal Department for any
further questions or **your compliance ambassador**.



E-learning through access to our KnowBe4 platform

3.5.
CONFLICTS OF
INTEREST

We are committed to a zero tolerance policy regarding conflicts of interest within our Group. We expect all staff members to act in the best interests of the Group, and to avoid situations in which their personal interests might affect their professional decisions. We therefore have a strict policy which requires 1. every staff member to disclose any personal, financial or other interest which might influence his/her decisions; 2. every staff member to avoid engaging in activities which place him/her in a situation in which he feels a sense of obligation to a third party, to the detriment of Group.

LET’S ACT TOGETHER



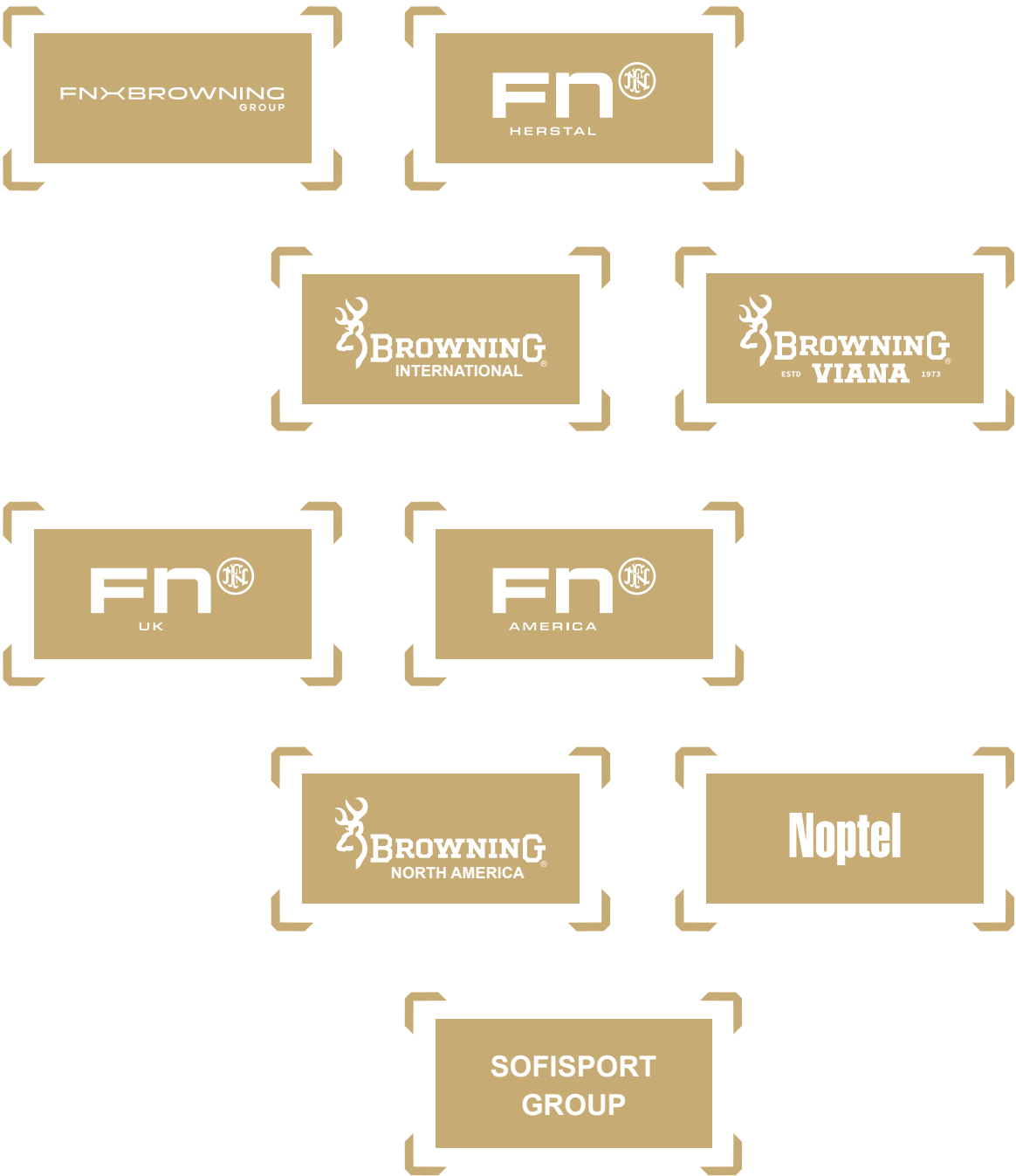
- >> Disclose any personal, financial, or other relationship which could create a conflict of interest.
- >> Not take part in a decision-making process in which a conflict of interest exists.
- >> Follow our Group policy in order to manage and resolve conflicts of interest.



- >> Use your position for yourself, members of your family, or staff members who are close to you, in a disloyal manner.
- >> Engage in activities which compete with the interests of our Group.
- >> Cover up or fail to report potential conflicts of interest to the HR department or the Compliance Officer.

CONSULT THE APPLICABLE DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Compliance Officer or the Legal Department for any
further questions or **your compliance ambassador**.



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3.6. FAIR COMPETITION

We comply with the applicable antitrust and competition laws, and we are committed to promoting fair and open competition in all of the markets in which we operate. Consequently, we avoid anti-competitive practices such as price fixing, bid rigging and market allocation, and we do not share sensitive business information with our competitors.

LET’S ACT TOGETHER



- » Participate in fair competition, while abiding by antitrust laws and competition laws, and following the Group’s fair competition policy.
- » Report any anti-competitive practices, such as price fixing or market allocation, to the Compliance Officer.
- » Provide correct and truthful information on your products and services, in the context of marketing and sales activities.



- » Collude with competitors in order to manipulate markets or prices.
- » Spread false or misleading information about competitors, in order to gain an advantage.
- » Take advantage of a dominant market position by unfairly restricting competition.



04.
**OUR
PRODUCTS
AND TECHNO-
LOGIES**

Quality management55

The Environment57

Protection of our Intellectual Property and know-how59

Traceability and accuracy of documentation61

Security of our Information System63

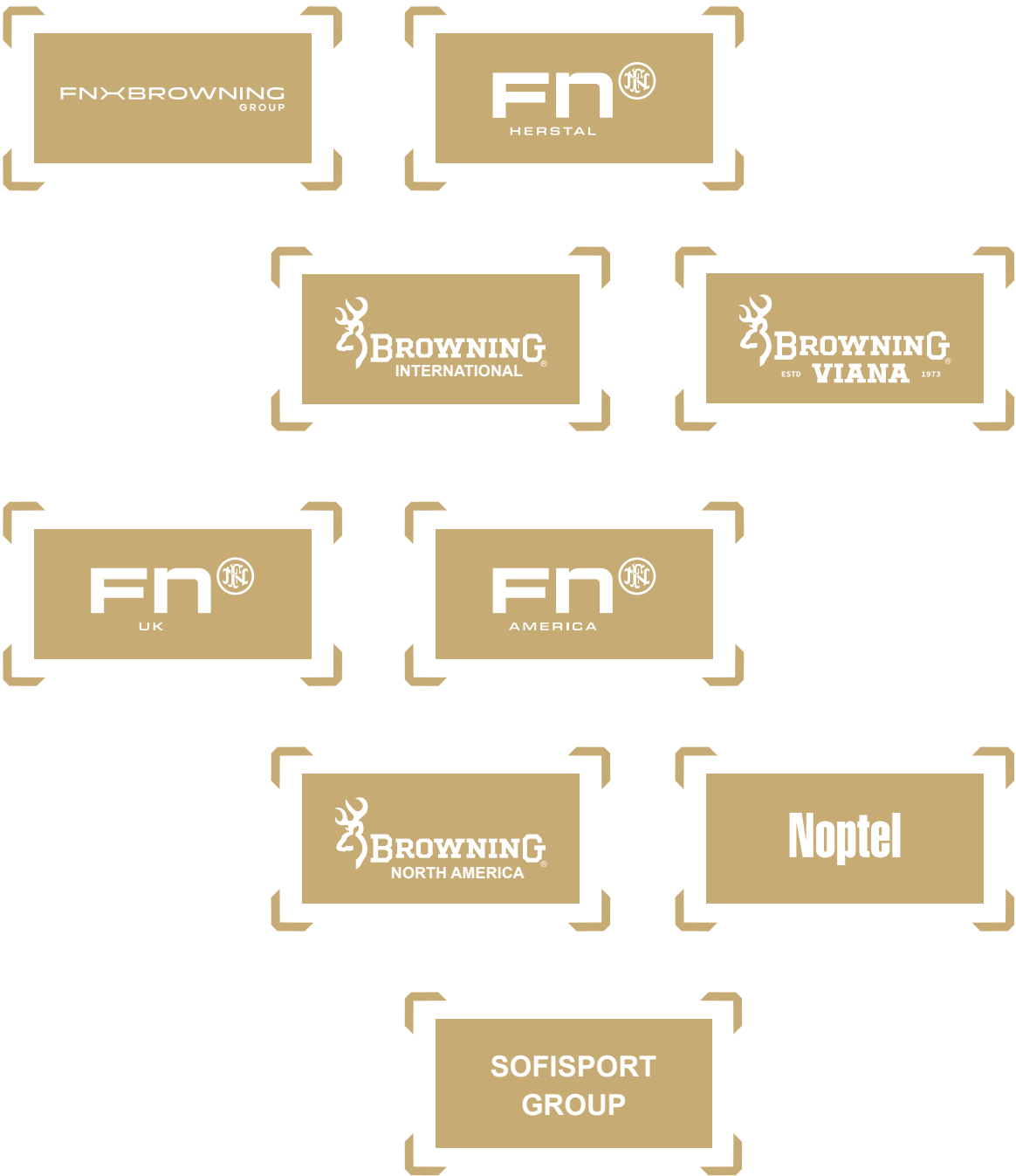
Confidentiality65

Management of our Communication67



CONSULT THE
APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ➤



Please contact the Quality Department for any further questions or
your compliance ambassador.

4.1.
QUALITY
MANAGEMENT

We take care to ensure that our products and technologies meet the highest quality and safety standards of our industry. We strive to supply products which meet our clients' expectations, and comply with all applicable laws and standards. We guarantee that our products are reliable, sustainable and suitable for their use, in particular, considering their crucial applications, and we continuously improve our design, manufacture and test processes in order to maintain this level of quality.

LET'S ACT TOGETHER



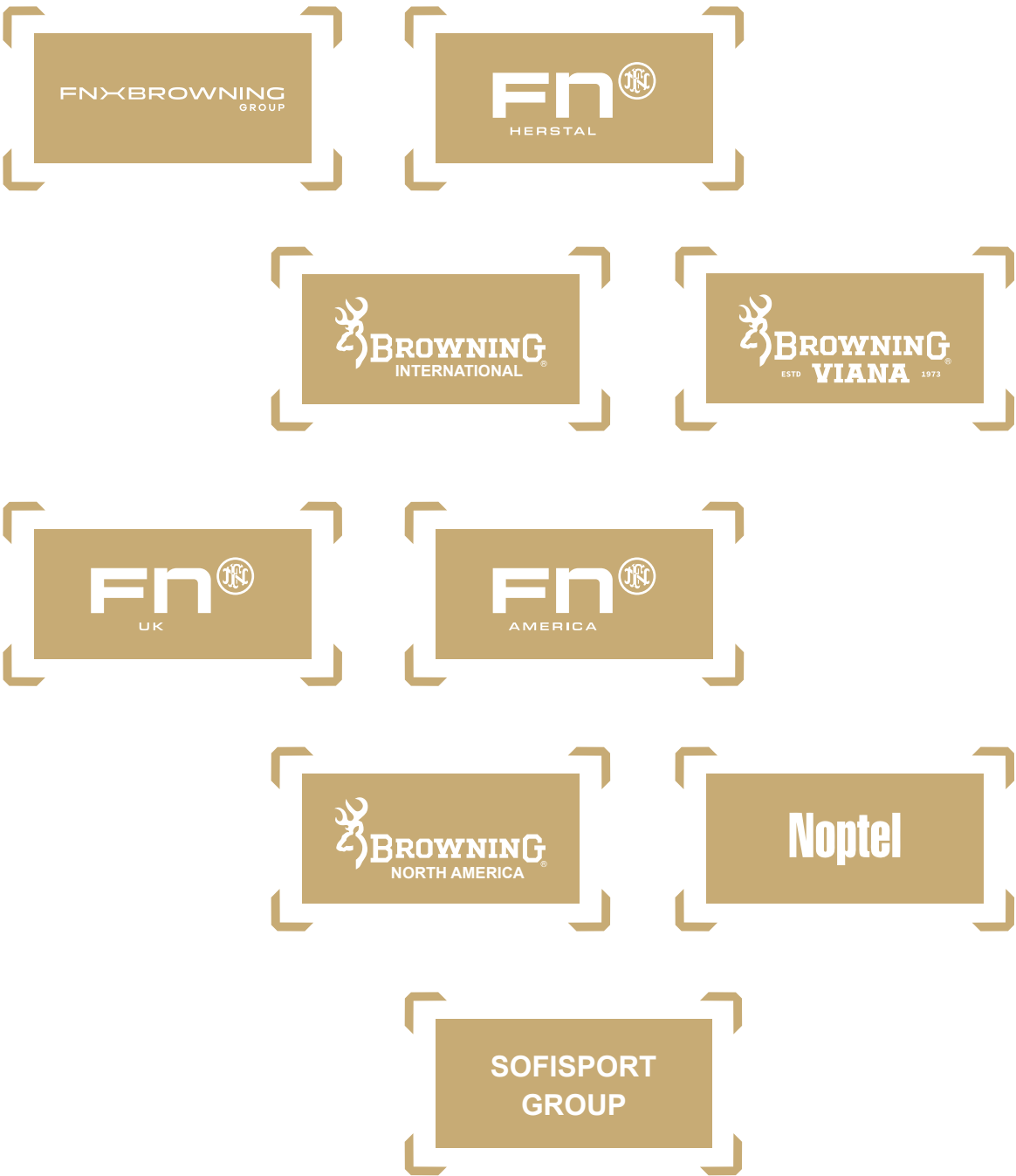
- » Design, manufacture and supply products which meet or exceed industry standards and clients' expectations.
- » Implement stringent quality procedures in order to guarantee the safety, reliability and effectiveness of all products.
- » Continuously improve products through research, innovation and the remarks of stakeholders.



- » Compromise on quality in order to reduce costs or respect deadlines.
- » Do not disregard flaws or problems identified throughout our value chain.
- » Misquote the specifications, capacity/capability or certifications of the products.

CONSULT THE
APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ▶



 Please contact the Environment Department for any further questions or
your compliance ambassador.

4.2.
THE ENVIRONMENT

We are committed to minimising the environmental impact of our products and operations, by incorporating environmental considerations into the design, manufacture and lifecycle management of our products and means of production. Moreover, we respect environmental laws and regulations, including those specific to hazardous materials.

LET’S ACT TOGETHER



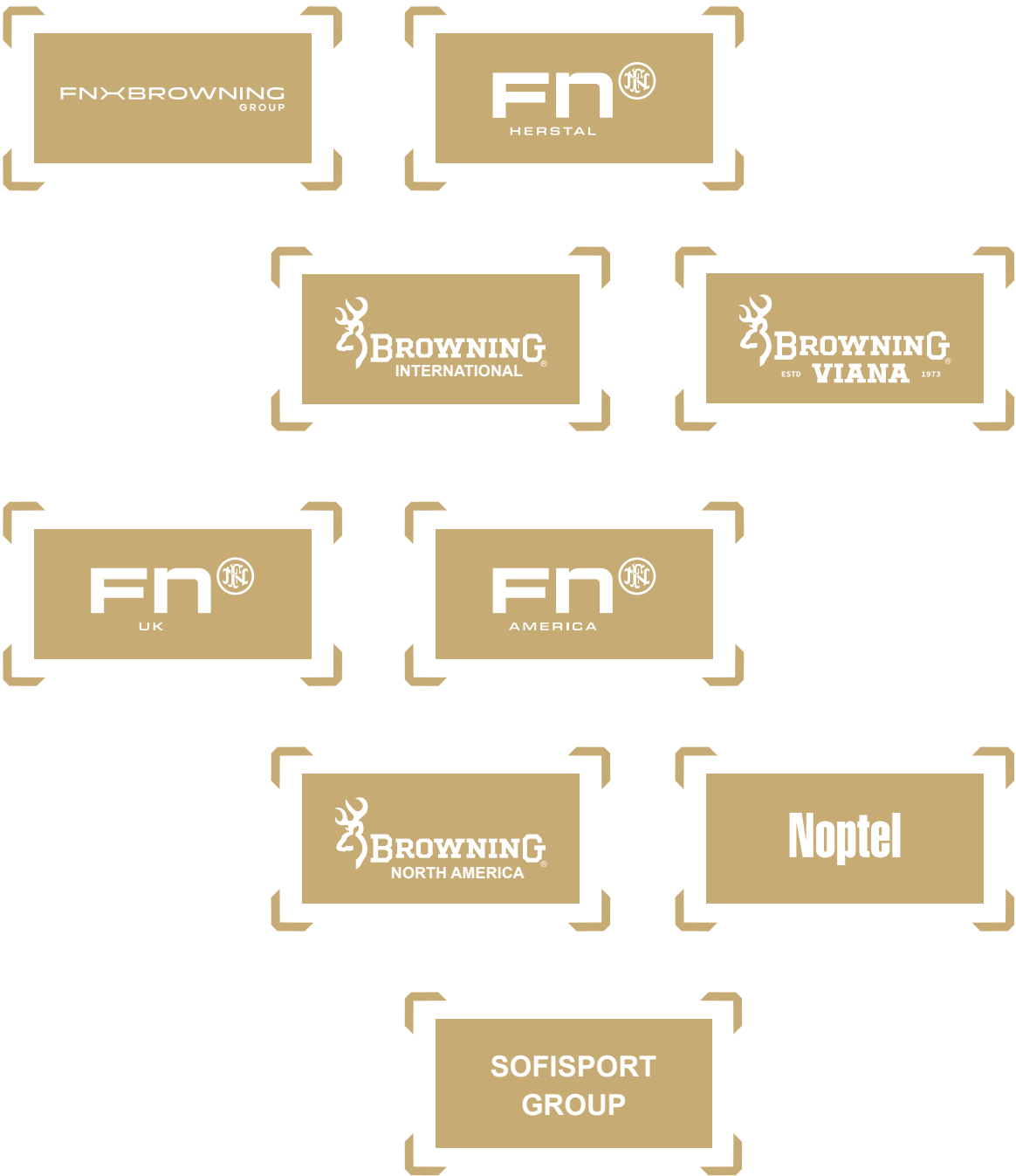
- » Minimise the environmental impact of your products and operations, by adopting sustainable practices, such as reducing emissions, waste and the consumption of resources.
- » Develop technologies with the aim of reducing our impact on the environment.
- » Comply with all environmental laws and regulations, at each business location of our activities.



- » Use materials or processes which cause needless damage to the environment, when alternatives are available.
- » Ignore environmental risks in the supply chain or the manufacture process.
- » Ignore regulatory requirements regarding waste management, emissions, or the use of resources.

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APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Legal Department for any further questions or
your **compliance ambassador**.



E-learning through access to our KnowBe4 platform

4.3.
PROTECTION OF OUR
INTELLECTUAL PROPERTY
AND KNOW-HOW

We are committed to protecting our intellectual property (IP), because it is a vital asset which supports our competitive advantage and innovation. Our intellectual property is therefore protected by patents, registered trademarks, copyrights and trade secrets from any unauthorised use or disclosure. Our commitment also includes protecting the intellectual property rights of others, and avoiding any potential infringement.

LET’S ACT TOGETHER



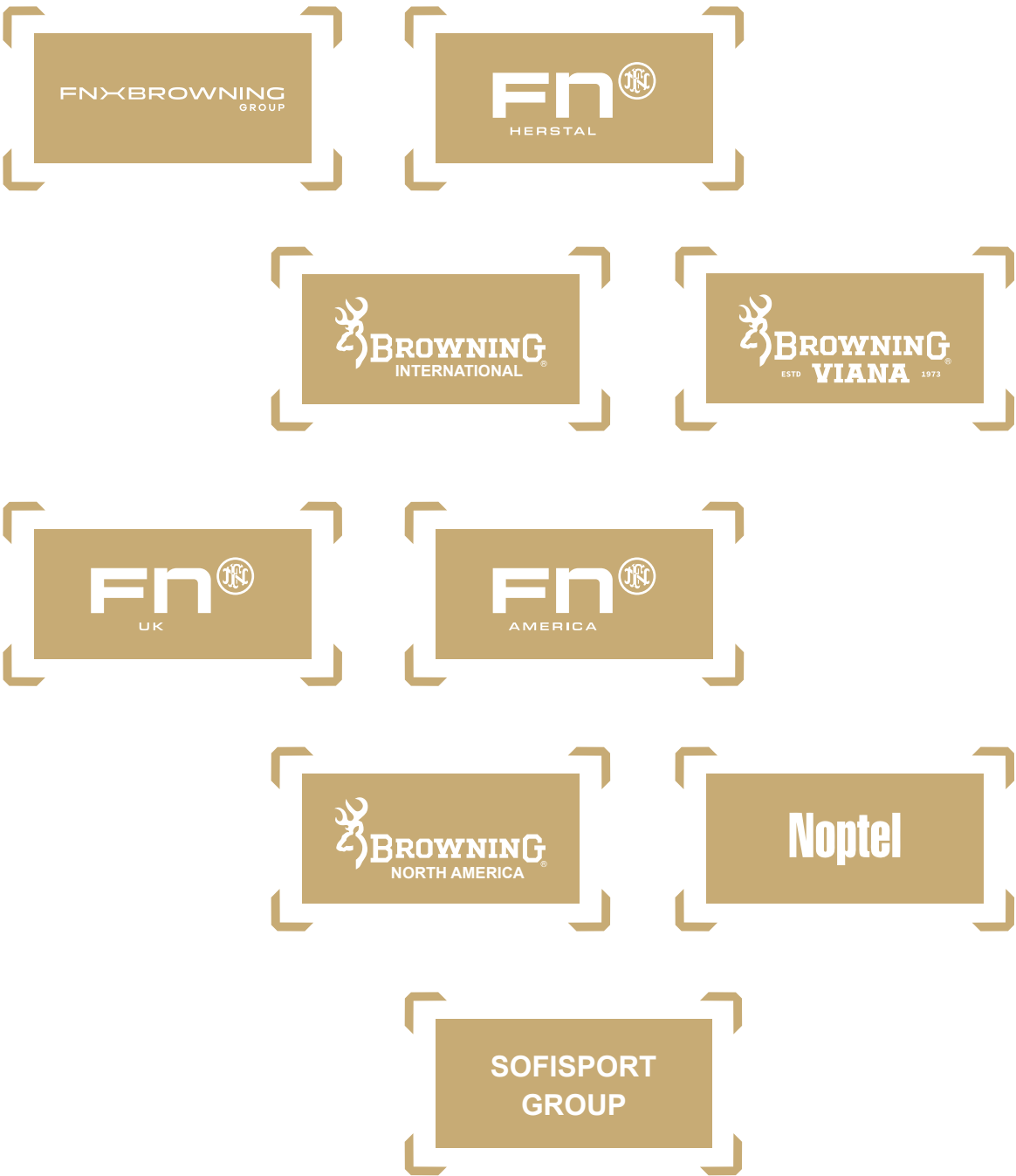
- » Protect the innovations, designs and trade secrets of the company, by protecting patents and registered trade marks, where this is necessary.
- » Make staff members aware of the importance of protecting intellectual property (IP), and the risks of accidental disclosure.
- » Ensure that contracts with third parties include clauses intended to protect the intellectual property of our Group.



- » Share intellectual property information without authorisation or an appropriate contract being in place.
- » Use the intellectual property of others without obtaining the appropriate authorisations or appropriate licences.
- » Fail to report potential thefts or violations of intellectual property.

CONSULT THE
APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Quality Department for any further questions or
your compliance ambassador.

4.4.
TRACEABILITY AND ACCURACY
OF DOCUMENTATION

We are committed to guaranteeing the traceability and accuracy of the information contained in our registers/ledgers, because it is essential to guarantee this compliance in our sector. In order to do this, we keep registers of our developments, our tests, and the distribution of products, and we strive to guarantee complete traceability of the materials and components used in our products.

LET’S ACT TOGETHER



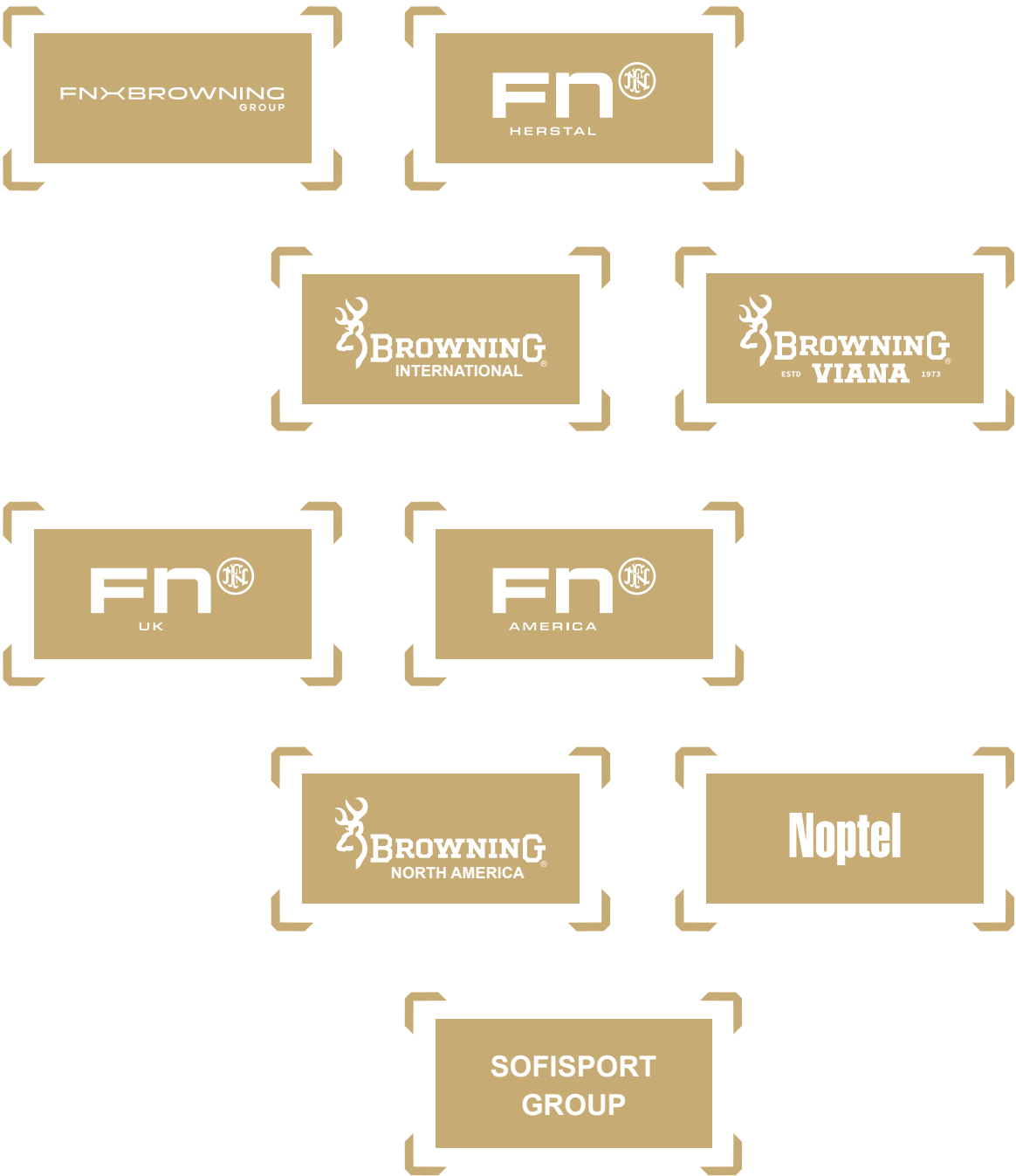
- » Keep full and accurate records of all products - from design to supply -, thereby guaranteeing full traceability.
- » Implement systems to track and verify the origin, manufacture and distribution of materials and components.
- » Keep records, in compliance with legal and regulatory requirements.



- » Falsify or manipulate records in order to disguise errors or non-compliance.
- » Ignore gaps or inconsistencies in documentation which may compromise traceability.
- » Fail to recognise the importance of keeping meticulous registers/ledges for audits or inquiries.

CONSULT THE
APPLICABLE
DOCUMENTATION

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of your choice. ▶



Please contact the IT Department for any further questions or
your compliance ambassador.



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4.5.
SECURITY OF OUR
INFORMATION SYSTEM

We are committed to respecting the highest standards of cyber security, because our information systems are essential to protect sensitive data and ensure operational continuity. Therefore, we protect systems against cyber threats, unauthorised access and data breaches. We also ensure we have high standards of physical protection for all of our operating units within the Group.

LET’S ACT TOGETHER



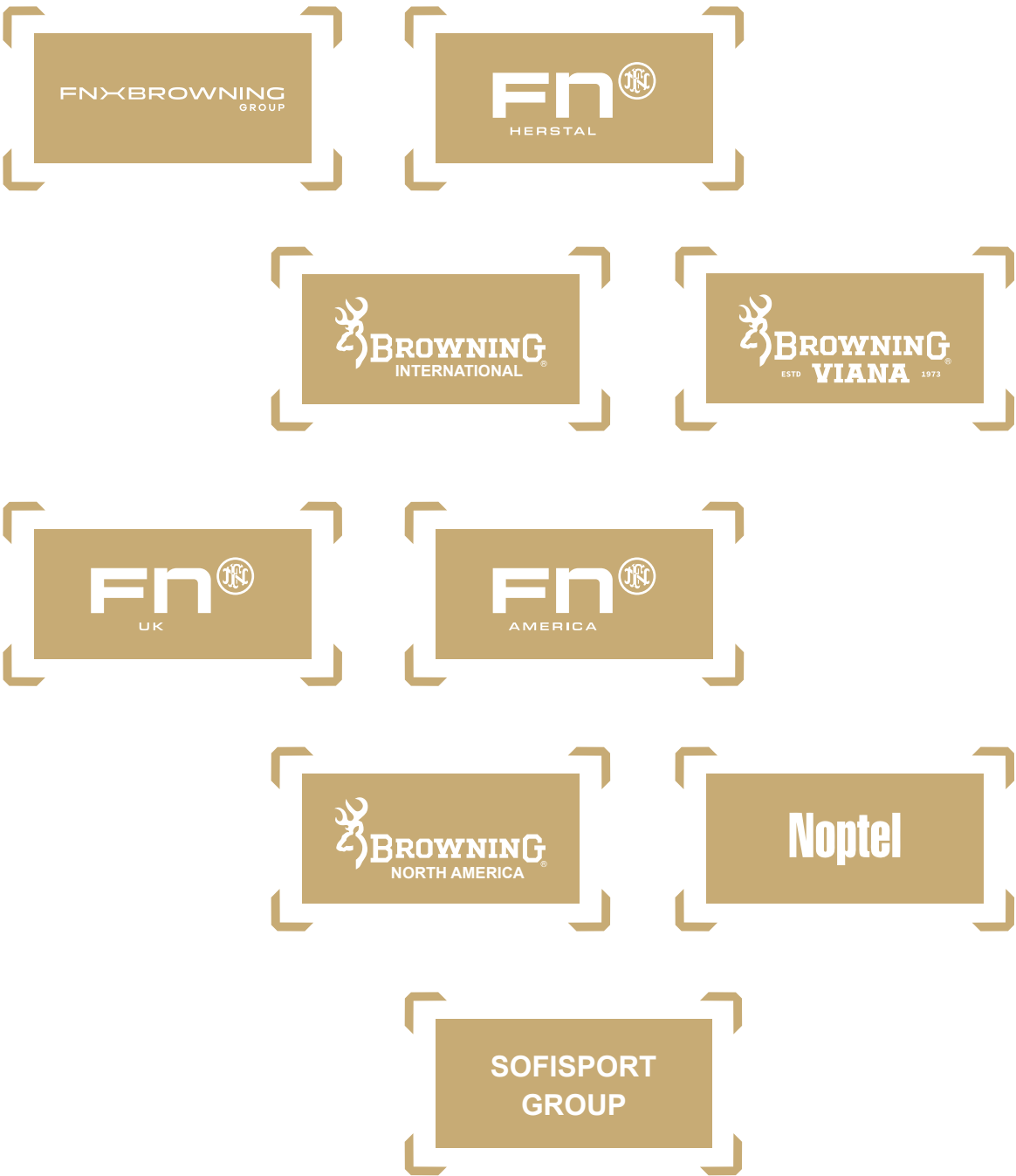
- » Use robust cyber security measures to protect the company’s systems, data and networks from unauthorised access and attacks.
- » Uphold strict access procedures for employees, and for visitors entering our operating sites.
- » Train employees in the best practices for the cyber security and physical security of our operating sites.



- » Share login details, or access sensitive systems, on unsecure networks.
- » Delay in reporting cyber security incidents, or breaches, to the IT Department.
- » Hold a door open for the person behind you, in a restricted zone where a badge is required.

CONSULT THE
APPLICABLE
DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Legal Department for any further questions or
your **compliance ambassador**.



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4.6.
CONFIDENTIALITY

We are committed to protecting confidential information, because it is vital for maintaining our competitive advantage, for the respect our legal and contractual obligations, and in order to safeguard the interests of national security. All staff members, subcontractors and business partners must handle sensitive information responsibly, and in compliance with our policies.

LET’S ACT TOGETHER



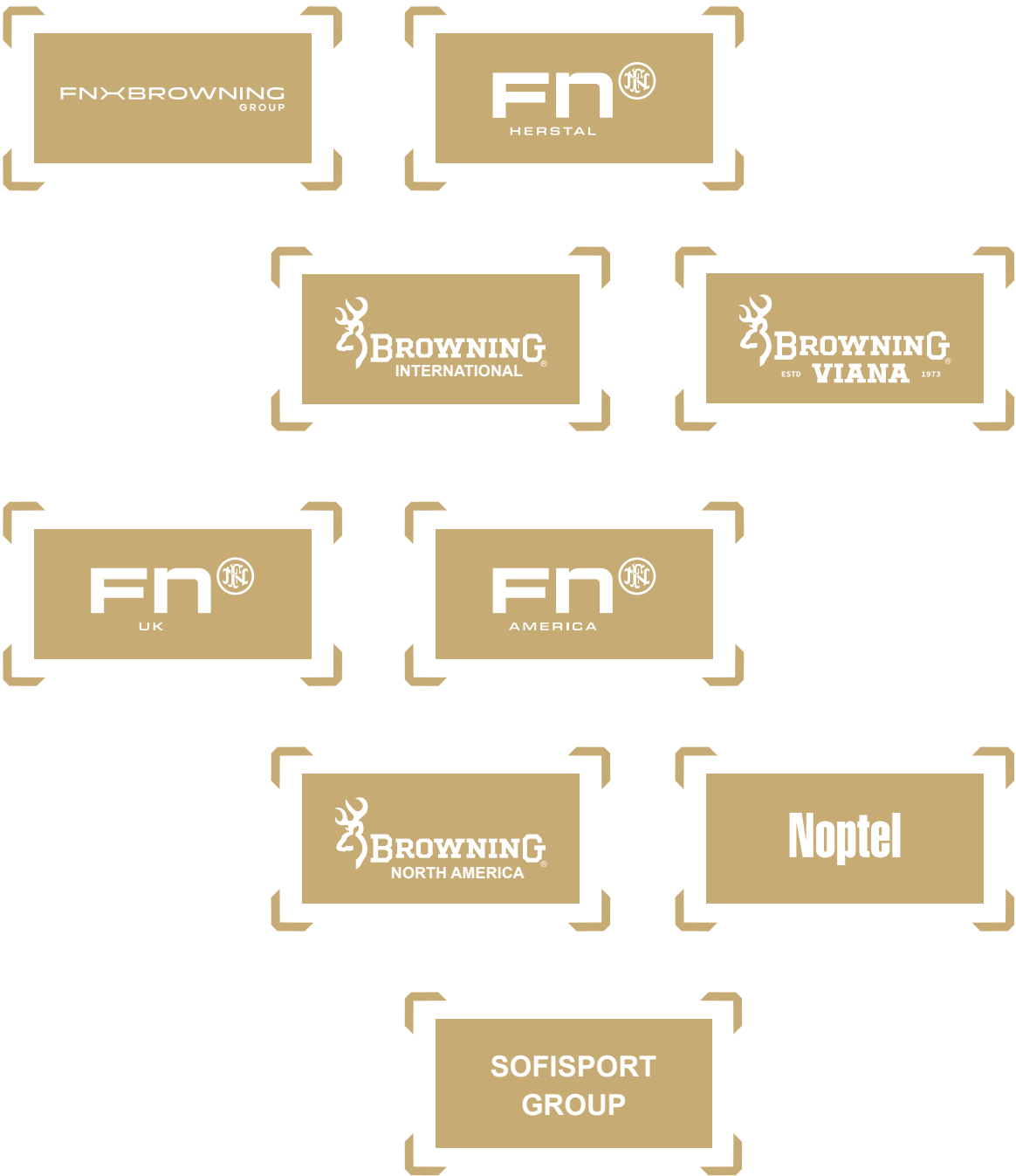
- » Handle sensitive information of the Group, including trade secrets, financial data, and staff members files, with the utmost rigour.
- » Limit access to confidential information to only the persons who need to know it in the context of their post.
- » Follow all Group policies and procedures relating to the categorisation of data, the confidentiality of data, and its storage and removal.



- » Share confidential information with unauthorised persons, including colleagues who have no authorisation or need to know it.
- » Share confidential information without putting in place a confidentiality agreement with the person with whom you wish to share the information.
- » Use confidential information of the Group for personal reasons or for external purposes, without obtaining authorisation to do this.

CONSULT THE APPLICABLE DOCUMENTATION

Simply click on the entity
of your choice. ▶



Please contact the Communication Department for any further questions or
your **compliance ambassador**.



E-learning through access to our KnowBe4 platform

4.7. MANAGEMENT OF OUR COMMUNICATION

We are committed to communicating, both internally and externally, in line with principles which reflect the values and reputation our Group. Therefore, we always take care to ensure that all communications are correct, respectful, and compliant with Group policies; and to protect confidential and sensitive information from the general public and on social networks.

LET’S ACT TOGETHER



- >> Ensure that all communications, both internal and external, are correct, clear, and comply with Group policies.
- >> Use approved channels and formats for sensitive or official communications.
- >> If you receive an information request from the media, it must always be transferred to the Communication Department, in order to ensure alignment with the Group’s communication strategy.



- >> Divulge confidential or sensitive information to the public, or on social networks.
- >> Use unapproved or unsecure methods for sending official communications of the Group.
- >> Make statements on behalf of the Group, via any communication channel at all, without the appropriate advance authorisation.



05.
DARE TO
SPEAK UP



SPEAK WITH INTEGRITY AT FNXBROWNING GROUP

Simply click on the entity
of your choice. ▶





















At FN Browning Group, we regard integrity as at the heart of everything we do. In order to defend our values and our principles, it is vital that everyone feels authorised to express him/herself, when faced with behaviour or practices which are likely to breach our Code of Conduct, our policies, or the law.

Self expression is not just a right, it is a responsibility. When you report a problem, you help protect all of us, our organisation, our colleagues, and our various stakeholders. Dealing with problems from the start, allows us to solve them effectively, and demonstrates our commitment to transparency and responsibility.

You have several choices of communication channel for raising issues:

- 1. Your manager;
- 2. The Compliance Officer at address complianceofficer@fnbrowninggroup.com, or the Compliance Ambassador with knowledge of the subject;
- 3. Our **Integrity Line**, which is an anonymous reporting channel, available 24/7. This channel guarantees you:
 - **Confidentiality:** All reports made via our Integrity Line will be handled with the greatest discretion.
 - **Without reprisals:** We strictly prohibit reprisals against anyone who raises a concern in good faith, even if the issue turns out to be unfounded.

So, feel free to report any concerns you may have, using these reporting channels!

