



Code of ethics

to all employees

Our ethical charter

UPERGY is a European group
specialising in the distribution of consumables
in the field of autonomous energy.

The Group has a Quality Management System
as well as an **Environmental Management System**
thanks to its ISO 9001:2015, ISO 45001:2015,
ISO 14001:2015, ISO 13485 and ISO 20400:2017.

As part of the continuous improvement of its practices,
UPERGY has drawn up the following charter to define
the Group's social, environmental and economic responsibilities and provide a
framework for its actions and objectives.

**This ethical charter is intended for all UPERGY Group employees.
employees of the UPERGY Group.**

01

**Social and societal
responsibility**

02

**Environmental
responsibility**

03

**Economic
responsibility**

01 Social and community responsibility



Working hours and conditions

We are constantly striving to improve the working conditions of our employees.

This involves a number of factors: social, psychological, environmental, organisational, managerial and physical, all of which define their working environment.

Health and safety

Our QHSE department works to continuously improve risk prevention and protection at all our sites. Measures are systematically taken against any physical or moral aggression.

We are committed to an approach aimed at compliance with the ISO 45 001 standard on health and safety in the workplace, for which we are certified.

Employee well-being

The drafting of the Management Charter and the Teleworking Charter bears witness to our desire to improve the quality of life of our employees within the company. This includes actively combating harassment and discrimination in the workplace. We promote teleworking for jobs where this is possible.

Social dialogue

Developing a relationship of trust at all levels is an important part of our social policy.

We encourage dialogue between each employee and his or her line manager, as well as with employee representatives.

Wages and remuneration

We respect the legal and contractual standards of the countries in which we operate. We apply a clear remuneration policy in line with business practices.

Remuneration is a lever for motivation and performance in the company, so it is essential for us to put in place a fair policy for all our employees, particularly in terms of equal pay for men and women. Salary scales are drawn up within each department to ensure equality between all employees.

Cohesion.

We encourage initiatives that promote cohesion between employees. The development of cross-functional projects and meetings between employees are recommended.

Respect for private life

The balance between the professional and personal lives of our employees is paramount. We fight against abuse of their private lives.

Professional development

We encourage our employees to develop their skills and promote career development at all levels.

Action in the public interest

We want to develop new initiatives for the general good, particularly through sponsorship, and we support various associations in this respect.

Global Compact

Since 2012, UPERGY has endorsed the principles of the United Nations Global Compact on human rights, labour standards and anti-corruption.

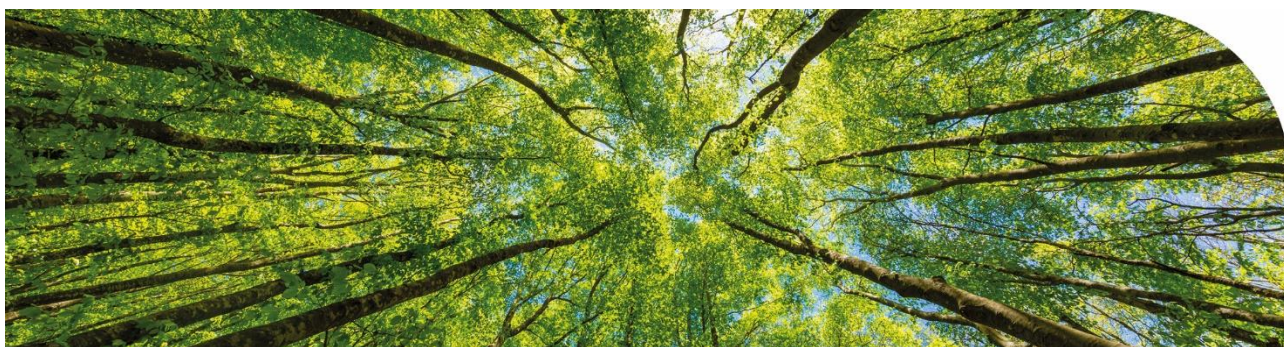
Non-discrimination

We fight against all forms of discrimination in hiring, remuneration, career development, as well as in the internal and external relations of our employees.

Openness to young people

We help young people enter the world of work through work-linked training and internships.

02 Environmental responsibility



Reducing carbon emissions

We are promoting the use of low-carbon means of transport among our employees and we are favouring remote relations with our stakeholders to reduce travel thanks to a Sustainable Mobility plan formalised in 2024 and being rolled out over 2025. We are working to reduce the impact of carbon emissions linked to our upstream and downstream transport operations by choosing modes of transport with the lowest possible impact and by encouraging relocation.

Reducing waste

We apply a 'paperless' policy with our employees and stakeholders, and sort and recycle waste at all our sites. Every year we take part in the European Week for Waste Reduction. We have a clear policy for sorting our waste on the premises, as well as our hazardous waste.

Carbon footprint

We are committed to producing and analysing a full carbon footprint (scope 1, 2 and 3) by 2022, and to reducing our greenhouse gas emissions. This assessment will enable the CSR Department to monitor our commitments and reinforce our actions to reduce emissions.

Energy consumption

We are committed to monitoring our energy consumption at all our sites, and every employee is encouraged to adopt best practice and reduce our energy impact.

Recycling

We guarantee to provide means of recovering used products for recycling (batteries, electronic waste).

Responsible purchasing

We are ISO 20400:2017 certified with the aim of reducing our product packaging and moving towards more responsible purchasing practices.

ISO 26000 – Corporate Social Responsibility

We are committed to adopting a sustainable approach based on the ISO 26000 standard to cover all issues and comply with market regulations.

ISO 14001 – Environmental Management System

To ensure that we maintain our environmental commitments, UPERGY complies with the requirements of ISO 14001:2015.

03 Economic responsibility



Customer relations

Transparency, fairness and availability are our top priorities in ensuring customer satisfaction. We strive to meet our customers' expectations as fully as possible, and are constantly improving our practices, in particular in line with the ISO 9001:2015 standard.

Respect for business law

At UPERGY, we fight against abusive practices such as corruption, abuse of position or collusion through an anti-corruption code of conduct, employee training and the implementation of an internal whistle-blowing procedure.

Relations with suppliers

We aim to maintain a mutually beneficial and fair relationship with our suppliers at all levels.

Confidentiality of personal information

We manage the information of all our stakeholders in compliance with the General Data Protection Regulation (GDPR).

Compliance with the rules of good governance

We adhere to the Middelnext governance code and ensure that the Executive Committee and other management bodies function properly. We keep our various stakeholders informed about the company's results and strategy.