

ETHICAL CHARTER

INTRODUCTION

Cedre, a state-approved association governed by the French 1901 law with a public service mission, provides advice and expertise to French and foreign public and private authorities and organisations in charge of the response to accidental water pollution.

These missions are accomplished through the application of a rigorous and honest scientific approach as well as the adoption of a neutral viewpoint into the produced analyses and the given advice.

In order to ensure that these missions are carried out in an exemplary manner, Cedre is responsible for providing ethical guidelines to all of its employees.

Cedre is a small structure, but its public service (as well as advice and expertise) activities require the association and each of its staff members to be exemplary and rigorous at all times. Each of them comes, or could potentially come, into contact with a very wide variety of public or private, French or foreign representatives sometimes with very important institutional, political, or economic responsibilities. This great variety of players is coupled with a great variety of activities which may lead every one of us to work alone, far from the association's headquarters, and sometimes in a crisis situation. This situation makes it necessary to implement ethical principles which protect Cedre, every one of its employees, and our partners from the risks inherent to our activity.

These guidelines can be found in the ethical charter below.

SCOPE

This charter applies to all Cedre employees regardless of their status (employee, intern, contractor) as well as all relations with people associated with Cedre, such as its clients, suppliers, board members, consultants, subcontractors, or external contractors working for Cedre.

Each employee, regardless of their hierarchical level, must apply, within the limits of their duties and responsibilities, the rules set out below which come under their duty of loyalty and good faith in the performance of their employment contract, and must ensure that they are also applied within their team or by the people under their responsibility.



Employees who do not respect the principles of this charter may be subject to disciplinary action in accordance with the provisions of Cedre's rules and regulations.

1. FAIR COMPETITION

Cedre ensures that the rules of competition are respected so that competition is fair and equitable. No action of Cedre shall prevent, restrict or distort competition.

Cedre rejects all unfair competitive and commercial practices, in particular any agreement or concerted practice concerning financial conditions and the distribution of services, markets, or clients.

All formal agreements, concerted practices and informal meetings having the effect or aim of restricting free competition or fair competition are prohibited. Thus, the financial conditions are set independently.

2. CONFLICT OF INTEREST

A conflict of interest exists when an employee is in a position to influence a decision by Cedre that is liable to confer a personal advantage on them or to favour a friend or relative.

Cedre's decisions are made objectively, without any personal considerations. Any activity or mission by employees and Cedre's governance bodies (Strategy Committee, Board of Governors, etc.) which runs counter to Cedre's interests is prohibited.

Numerous situations may give rise to this type of conflict, in particular when an employee or a member of their family has direct or indirect interests, in particular with a supplier or client of Cedre. Additional activities on behalf of companies, clients, partners, or suppliers as well as financial holdings in such companies must be communicated to the employee's line manager who will inform senior management; such activities are only permitted upon express written authorisation from the management, at least by e-mail.

The same rules apply when a close family member is an employee of a client or supplier. Cedre employees must identify the risks of conflict of interest, disclose them to their line manager and act, in all circumstances, in the best interests of Cedre.

In the interest of integrity, they must also refrain from any action that could cause a conflict of interest, whether actual or potential. Employees must not use their position within Cedre for direct or indirect personal gain. When faced with a conflict of interest, the employee must not take part in the relevant decision.

3. INTERACTION WITH THIRD PARTIES

3.1. Reporting of abnormal behavior by third parties

Any form of pressure or attempt to influence (insistent requests, excessive presence, harassment, threats, etc.) exerted by an individual or by a member of a third party organisation on a Cedre employee in order to impose a decision or abstention must be reported immediately to the line manager who will inform senior Management.



Management may then order the individual or third party organisation to cease such abnormal behavior, and if deemed appropriate, will take all necessary measures to stop it.

3.2. Gifts, invitations and benefits

In order to avoid any situation of dependence on third parties or doubt as to their probity, impartiality, or integrity, Cedre employees are prohibited from soliciting or accepting gifts, invitations, or other benefits from third parties with whom Cedre has relations, except with Cedre's agreement. Any offer of gifts, invitations, or other benefits from third parties must be reported to the employee's line manager. This rule does not apply to promotional items of little value, to working lunches or dinners provided that they remain occasional and reasonable, and to the payment of travel and accommodation for employees when this expense is part of the negotiated service.

3.3. Whistleblowers

In accordance with French Law n°2016-1691 of 9 December 2016 on transparency, the fight against corruption, and the modernisation of economic life (known as the "Sapin 2" law) which provides a general legal framework for whistleblowing and establishes whistleblower protection, Cedre designates an employee who is in charge of collecting any whistleblowing reports that may be issued by colleagues. The designation of the person and the recording procedure is described in the association's rules and regulations.

4. HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION AT WORK

No Cedre employee shall be required to work in an environment liable to endanger their physical, mental or moral integrity. This necessity is a strong commitment from Cedre's management, but applies also to each Cedre employee, who must act upon it. Every employee must, within their capacity, help to:

- Create a safe working environment for their colleagues;
- Strictly apply safety instructions in order to minimise the risk of accidents;
- Report all incidents and accidents without delay.

In addition, Cedre is committed to having the lowest possible impact on the environment via its ISO 14001 quality approach.

5. EQUAL OPPORTUNITIES AND NON DISCRIMINATION

Cedre is committed to fighting against all forms of discrimination, intimidation, and harassment, and to ensuring every employee progresses solely on the basis of their performance. Thus, Cedre employees must show courtesy and respect for one another at all times and shall not tolerate any inappropriate reference to origin, religion, age, gender, disability, or any other reference to private life in working relationships.

In order to guarantee equal treatment between women and men, Cedre has established a gender equality plan which is published on its website.

6. PRIVACY

Cedre respects and protects the privacy of information communicated by its partners, clients, and other stakeholders. Cedre also protects all information relating to its employees. Each employee is bound by the same obligations and principles, and may only seek confidential or personal information for the performance of tasks for which they are responsible; such information remains confidential in all circumstances. These obligations remain valid after the end of the employment contract.

7. PUBLIC IMAGE, INTERNET AND SOCIAL MEDIA

As mentioned in the introduction, Cedre is an association with a public service mission whose aim is to provide scientific and technical expertise in the field of accidental water pollution.

Every member of staff must take into account Cedre's specific mission and protect the association's credibility and reputation in all circumstances. Any publication, whatever the media, affects the association's image and must therefore be consistent with Cedre's missions and communication policy.

COMMITMENTS OF CEDRE EMPLOYEES

Cedre employees agree to respect the values of the association. They shall carry out their tasks with loyalty and intellectual rigour. They shall respect people's dignity and refrain from any form of discrimination, harassment, or violence (physical, verbal, or moral). They shall refrain from any criminal or abusive behaviour in the performance of their duties and agree to avoid any conflict of interest. Where applicable, they shall declare any potential or proven conflict of interest situation to enable the association to respond appropriately. They respect the privacy of all information they may access as part of their duties.

ENTRY INTO FORCE AND MODIFICATION OF THE ETHICAL CHARTER

This Ethical Charter is an addition to Cedre's rules and regulations and is therefore enforceable against Cedre employees. It is subject to change in order to adapt to changes, in particular in regulations.

In accordance with Article L. 1321-4 and R. 1321-2 and -4, this charter has been:

- ✓ Submitted for opinion to the Social and Economic Committee, under the terms of its meeting dated 26/01/2023;

- ✓ Communicated in duplicate to the Health and Safety Inspector overseeing Cedre, on 13/02/2023;
- ✓ Filed with the administration service of labour court in BREST, on 13/02/2023;
- ✓ Posted on the relevant display board on 13/02/2023.

Any subsequent changes will be subject to the procedure described above.

The effective date of this charter is 13/03/2023.

Christophe LOGETTE

Director

