

# CODE OF CONDUCT



# CONTENTS

## INTRODUCTION

- Our Ambition.
- Scope and Fundamental Commitments.
- Monitoring and Partner Commitments.
- Evaluation and Continuous Improvement.

## LABOR LAW

1. Textual foundations.
2. Guiding principles.
  - Combating forced labor and modern slavery.
  - Combating child labor.
  - Occupational health and safety.
  - Social dialogue and freedom of association.
  - Decent remuneration and fair working conditions.
  - Respect for diversity and inclusion.

## FIGHT AGAINST CORRUPTION

1. Principle.
2. Prohibited practices
  - Facilitation payments.
  - Gifts and invitations.
  - Conflicts of interest.
  - Use of intermediaries.
  - Political financing.
  - Patronage and sponsorship.
  - Unfair competition.

## HEALTH AND SAFETY REQUIREMENT

1. Stakeholders in the culture of prevention and safety
  - The management committee.
  - Managers.
2. Legal obligations regarding reporting and hiring.
3. Improving quality of life at work
4. Right to disconnect.
5. Prevention of occupational risks.
6. Audits and training.
7. Reporting difficulties and the right to withdraw from work.
8. Provision of equipment and clothing.
9. Employee responsibility.



# CONTENTS

## 0 TOLERANCE FOR VIOLENCE, DISCRIMINATION, AND HARASSMENT

- 1. Definitions.
  - Sexist behavior.
  - Sexual behavior.
  - Acts of discrimination.
  - Moral harassment.
  - Acts of violence.
- 2. Collection of reports.
- 3. Handling of reported incidents.
- 4. Precautionary measures that may be implemented following a report.
- 5. Measures that may be implemented following a report.

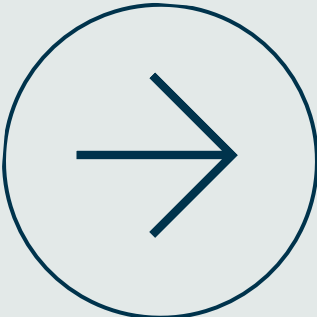
## USE OF COMPUTER AND DIGITAL RESOURCES

- 1. General Principles of Use.
- 2. Best Practices and Prohibited Behaviors.
- 3. Prohibition on the Use of Personal Equipment.
- 4. Commitments Expected from Partners in Terms of Digital Security.

## PRIVACY AND DATA PROTECTION POLICY

- 1. Scope of application.
- 2. Purposes of the Data Collected.
  - Browsing and services.
  - Security and fraud prevention.
  - Website improvement.
- 3. Recipients of personal data.
  - Transmission to manufacturers.
  - No transfer to third parties for commercial purposes.
  - Sensitive data.
- 4. Non-Disclosure and Transfer of Personal Data.
- 5. Data Security and Confidentiality.
- 6. User Rights.
- 7. Notification of Personal Data Breaches.
- 8. Data Controller and how to exercise your rights.

## CONCLUSION



# PREAMBLE

The rapid evolution of the global economy and the growing urgency of climate challenges make the transition toward more responsible and sustainable practices essential.

Businesses bear a significant responsibility in building a society that respects both the environment and human rights.

We firmly believe that this goal is achieved through the establishment of trust-based relationships and the promotion of business practices aligned with these core values. It is in this spirit that we adopt the present Code of Conduct.

# Message from the president

“

*Specializing in B2B wholesale of industrial supplies and equipment, we are committed to offering reliable, innovative, and sustainable solutions. Every day, we support businesses and regions in their quest for greater energy independence.*

*This commitment is part of a gradual environmental transition based on performance, responsibility, and the pursuit of concrete and measurable impact.*

**ARNAUD SOURDRILLE, PRESIDENT.**



# Our Values



## INNOVATION

Ability to find creative and original solutions to environmental and societal challenges.



## TRANSPARENCY

Open and honest communication about our practices, impacts, and objectives with all our stakeholders.



## SUSTAINABILITY

Commitment to building a sustainable economic model that takes into account long-term environmental and societal issues.

# Introduction

## 1. Our Ambition: A Safe and Respectful Work Environment

At GREEN POWER TECHNOLOGIE, our commitment is to ensure a safe, healthy, and respectful work environment for all our teams and partners. Through a proactive approach and continuous improvement, we embed the principles of this Code of Conduct at the core of our operations. Our efforts focus on identifying, reducing, and managing occupational risks, while fostering a culture of vigilance and shared responsibility. By training our teams and engaging our ecosystem, we create a framework where everyone can thrive with peace of mind.

## 2. Scope of Application and Fundamental Commitments

This Code of Conduct applies to all GREEN POWER TECHNOLOGIE employees and partners. It defines a framework for integrity and responsibility in our professional activities and reiterates the importance of:

- Raise awareness of ethical and legal risks
- Provide guidelines for ethical behavior
- Actively combat corruption
- Ensure respect for fundamental rights throughout our value chain
- Guarantee a healthy and safe work environment
- Prevent and penalize sexism and harassment
- Protect personal data and comply with regulations
- Engage our ecosystem in upholding these rules

This Code represents our collective commitment to a respectful, safe, and ethical work environment. Compliance with its rules, commitments, and principles is an essential and non-negotiable requirement for all our partners. Any serious, repeated, or deliberate breach may result in the immediate termination of the contract, at the sole fault of the partner, without prejudice to any further legal action.





### 3. Monitoring and Commitments of Partners

In order to guarantee respect for human rights throughout its value chain, GREEN POWER TECHNOLOGIE adopts a rigorous approach based on close collaboration with its partners.

Each stakeholder working with GREEN POWER TECHNOLOGIE certifies that, prior to signing this Code of Conduct, it has not directly or indirectly bribed or attempted to bribe GREEN POWER TECHNOLOGIE employees, its customers, public officials, political entities, or any other interested party. They also declare that they have not taken any action that could result in a violation of anti-corruption laws by GREEN POWER TECHNOLOGY and confirm that there are no conflicts of interest.

GREEN POWER TECHNOLOGY may request specific information from its partners regarding their human rights policies, practices, and procedures. This approach aims to assess risks, identify potential vulnerabilities, and implement appropriate and proportionate corrective measures. GREEN POWER TECHNOLOGIE's partners are required to be transparent and provide comprehensive and accurate information. Any concealment of information that could harm the legitimate interests of GREEN POWER TECHNOLOGIE would constitute a significant breach of their commitments.

In order to ensure compliance with these commitments, GREEN POWER TECHNOLOGIE reserves the right to conduct audits of its partners. These checks are part of a shared commitment to promoting responsible conduct throughout our supply chain.

### 4. Evaluation and continuous improvement

In order to ensure the effectiveness of this policy and its ongoing adaptation to new regulations, GREEN POWER TECHNOLOGIE constantly monitors developments and adapts its policy in line with regulatory and societal changes and international best practices. Feedback from employees and all GREEN POWER TECHNOLOGIE stakeholders will be taken into account when updating this Code of Conduct.



# Part 1

## LABOR LAW



GREEN POWER TECHNOLOGIE is committed to ensuring fair, secure, and compliant working conditions in accordance with all applicable regulations. We uphold the fundamental rights of workers, equal opportunity, non-discrimination, and the protection of health and safety. All our employees and partners must adhere to these principles to maintain a respectful work environment.

## 1. Textual Foundations

GREEN POWER TECHNOLOGIE adheres to the principles of human rights and human dignity, as defined by international, European, and national law, including:

- The Universal Declaration of Human Rights of December 10, 1948.
- The Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) signed by the member states of the Council of Europe on November 4, 1950.
- The International Convention on the Rights of the Child (CRC), a treaty adopted by the United Nations on November 20, 1989.
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, adopted at the 86th session of the International Labor Conference (1998) and amended at the 110th session (2022).
- The 17 UN Sustainable Development Goals adopted in December 2015.
- The UN Global Compact, in particular its principles relating to human rights and labor standards, launched on July 26, 2000.

## 2. Guiding principles

### A. Combating forced labor and modern slavery

GREEN POWER TECHNOLOGIE requires all its partners to strictly comply with international standards on forced labor and modern slavery. It also encourages them to adopt a proactive approach to due diligence in order to identify and prevent any risk of violation of these rights in their own supply chains.

### B. Combating child labor

GREEN POWER TECHNOLOGIE does not tolerate any form of child exploitation in its activities or in those of its partners.

### C. Health and safety at work

GREEN POWER TECHNOLOGIE has implemented a comprehensive system for preventing occupational risks and improving working conditions for all its employees, in accordance with international health and safety standards. A similar commitment is expected from our partners.

### D. Decent wages and fair working conditions

GREEN POWER TECHNOLOGIE ensures that employees receive a decent wage, in accordance with legal standards and applicable collective agreements, guaranteeing fair and equitable working conditions.

### E. Social dialogue and freedom of association

GREEN POWER TECHNOLOGIE and its partners are committed to complying with international labor conventions on freedom of association and collective bargaining, and to promoting constructive social dialogue with employee representatives, including members of the Social and Economic Committee (CSE), the employee representative body responsible for defending employees' interests in terms of working conditions, health and safety, and economic and social issues. GREEN POWER TECHNOLOGIE encourages its partners to create a working environment where workers can freely join the union of their choice, participate in union activities, and collectively negotiate their working conditions without fear of reprisals, in consultation with the CSE when this falls within its remit.

### F. Respect for diversity and inclusion

GREEN POWER TECHNOLOGIE promotes an inclusive work environment that values diversity and equal opportunities. No discrimination based on gender, origin, religion, sexual orientation, disability, or any other personal characteristic is tolerated within the company or its partner companies.

# Part 2

## FIGHT AGAINST CORRUPTION



GREEN POWER TECHNOLOGIE is committed to maintaining the highest standards of integrity in all its activities. The fight against corruption is a collective responsibility that relies on the commitment of every employee, partner, and third party.

## 1. Principle

GREEN POWER TECHNOLOGIE is firmly committed to conducting all of its activities in accordance with the highest standards of ethics and transparency; the purpose of this policy is to ensure the full implementation of this framework. Accordingly, GREEN POWER TECHNOLOGIE undertakes, in particular, to:

- Comply with applicable laws and regulations.
- Combat all forms of corruption by promoting a corporate culture based on honesty and integrity.
- Sanction any breach of these principles by applying the measures provided for herein in a manner proportionate to the seriousness of the facts.

## 2. Risky practices rejected or strictly regulated by GREEN POWER TECHNOLOGIE

GREEN POWER TECHNOLOGIE reminds any person or entity acting on its behalf or in connection with it that the following practices are prohibited:

### A. Facilitation payments

Ces sommes indues visent à accélérer des démarches administratives courantes (comme le dédouanement, l'obtention de visas ou de permis) auxquelles le demandeur a normalement droit. Il est strictement interdit de verser ou de se voir demander des paiements de facilitation.

### B. Gifts and invitations

GREEN POWER TECHNOLOGIE ensures that it does not offer or provide any gift, invitation, or other benefit that could influence or be perceived as influencing its commercial relationships with Partners. GREEN POWER TECHNOLOGIE also rejects any gift or invitation offered with the expectation of a quid pro quo.



### **C. Conflicts of interest**

A conflict of interest refers to a situation where there is interference between the role performed within an organization and a personal interest, such that this interference influences or appears to influence the independent, impartial, and objective performance of the role on behalf of that organization. It is the responsibility of each manager and employee to ensure that they do not directly or indirectly engage in any activity that could place them in such a situation. In the event of a potential or actual conflict of interest, whether internal or external, the manager or employee must immediately inform their superiors in a comprehensive and transparent manner as soon as it is identified.

### **D. Use of intermediaries**

An intermediary is an entity (person or company) that acts on its own behalf to facilitate contracts or obtain decisions from third parties (public or private). Those who provide only technical or intellectual advice without acting as intermediaries are not considered intermediaries. The Legal Department must be consulted systematically in case of doubt. The use of intermediaries is strictly prohibited for illegal actions or actions that the company cannot perform itself. Although sometimes necessary (new markets, expertise), the use of intermediaries is risky and must be approached with great caution.

### **E. Political Financing**

In France and many other countries, legal entities are strictly prohibited from financing political party activities. In accordance with the legislative framework in force, GREEN POWER TECHNOLOGIE does not finance political parties or election campaigns, either directly or indirectly.

### **F. Patronage and sponsorship**

Philanthropy and sponsorship activities enable companies to support important causes or events. However, these actions may conceal other intentions, such as money laundering, corruption, or the financing of illegal activities. GREEN POWER TECHNOLOGIE's patronage and sponsorship projects must be aligned with its values and objectives, free from any conflict of interest and/or influence peddling. GREEN POWER TECHNOLOGIE also ensures in advance that the operation benefits an organization whose probity and integrity are beyond reproach, in order to avoid any infringement, financial or commercial risk for the company. GREEN POWER TECHNOLOGIE therefore conducts a thorough review of the organization, its governance, and its final beneficiaries, ensures that the organization is in good standing and that the funds are used in accordance with the defined criteria, and formally commits all its partners to do the same.

### **G. Unfair competition**

Partners must not monopolize the market or engage in unfair competition practices, either individually or in conjunction with others. Conduct that infringes on the rights of end users, as set out in the Commercial Code, is therefore prohibited

3. Good practices

GREEN POWER TECHNOLOGIE places particular emphasis on raising awareness among all its stakeholders in order to ensure the effective implementation of its anti-corruption policy on a daily basis. This involves the systematic adoption of best practices and a commitment to uphold the following ethical principles in all their professional interactions:

Principle	Recommendations
Transparency and Documentation	<ul style="list-style-type: none"><li>• Justify and rigorously document all transactions, including business gifts.</li><li>• Set up a centralized system for tracking gifts (register) and keep all supporting documents.</li><li>• Ensure that gifts are given in the interests of the company and comply with industry practices.</li></ul>
Rejection of suspicious offers	<ul style="list-style-type: none"><li>• Immediately refuse any offer perceived as an attempt at bribery or conflict of interest (payments, gifts, benefits).</li><li>• Raise awareness among teams about these practices and set up internal alert mechanisms to report any suspicious situations.</li></ul>
Systematic Consultation in Case of Doubt	<ul style="list-style-type: none"><li>• If you have any doubts about the ethics of a situation, consult the Legal Department or the internal ethics officer before making any decisions.</li><li>• Establish clear and accessible procedures for internal consultation on ethical issues.</li></ul>



Principle	Recommendations
Partner Background Checks	<ul style="list-style-type: none"><li>• Before establishing a business relationship, ensure that the partner complies with ethical and legal standards comparable to your own.</li><li>• Verify the reputation and compliance of your partners through internal investigations.</li><li>• Include contractual clauses guaranteeing compliance with ethical and anti-corruption rules.</li></ul>
Information Integrity and Controls	<ul style="list-style-type: none"><li>• Ensure the accuracy and completeness of information exchanged in commercial transactions.</li><li>• Facilitate regular audits and controls to ensure compliance and transparency in commercial practices.</li></ul>

**GREEN POWER TECHNOLOGIE relies on everyone's commitment and vigilance to detect and report any risky situations..**

#### 4. Alert System

A system for reporting conflicts of interest is in place at GREEN POWER TECHNOLOGIE. Any partner who has reasonable grounds to believe that there has been a serious and obvious breach of this Code, that there are facts presenting significant risks to GREEN POWER TECHNOLOGIE, that a crime or offense has been committed, that there has been a serious violation of a regulation (national, European, and/or international), or a threat to public order must report the matter confidentially to GREEN POWER TECHNOLOGIE via the GREEN POWER TECHNOLOGIE website.

<https://www.greenpower-technologie.com/en/our-commitments/whistleblowing-channel/>



# Part 3

## HEALTH AND SAFETY REQUIREMENTS



At GREEN POWER TECHNOLOGIE, the health and safety of our employees and partners is a priority. We expect all our partners and employees to comply with these requirements and implement the necessary measures to prevent risks and protect everyone's well-being.

## 1. Those involved in promoting a culture of prevention and safety at GREEN POWER TECHNOLOGIE

### **The executive committee**

The management of GREEN POWER TECHNOLOGIE is responsible for defining, disseminating, and monitoring its health, safety, and hygiene policy. It is responsible for defining strategic guidelines in accordance with current legislation and regulations, allocating the human, material, and financial resources necessary for the implementation and continuous improvement of the HSE management system, and ensuring the effectiveness of the HSE policy through performance indicators and regular management reviews.

### **The managers**

Managers at all levels of the hierarchy are responsible for the operational implementation of HSE policy within their teams. In particular, they must identify hazards and assess occupational risks related to their teams' activities, implement and monitor the effectiveness of appropriate prevention and protection measures, communicate and raise awareness among their employees about HSE issues and best practices, ensure compliance with established safety rules and procedures, and report information about hazardous situations or incidents to management and the HSE representative.

## 2. Legal obligations regarding reporting and hiring

GREEN POWER TECHNOLOGIE complies with legal obligations regarding declarations and hiring formalities, in accordance with Articles L1221-10 and L1221-13 of the Labor Code. We expect our partners to adopt the same rigorous approach in this area.

## 3. Improving quality of life at work

GREEN POWER TECHNOLOGIE is committed to ensuring a healthy working environment by taking into account both physical and psychosocial risks.

In accordance with the recommendations of the World Health Organization, GREEN POWER TECHNOLOGIE strives to prevent these risks by fostering a respectful working environment and offering measures such as a charter on reporting acts of violence, discrimination, moral or sexual harassment, and sexist behavior in the workplace, which addresses these issues internally.

It should also be noted that the Social and Economic Committee (CSE), and in particular its representative for sexual harassment, is also a key point of contact for reporting incidents and actively contributes to the prevention and handling of such situations.

## 4. Right to disconnect

In order to ensure a healthy work-life balance, GREEN POWER TECHNOLOGIE recognizes and encourages the right to disconnect. Employees are not required to respond to work-related requests outside of working hours, except in exceptional and duly justified circumstances. The company encourages responsible use of digital tools and raises awareness among its employees of the importance of disconnecting in order to maintain their well-being and prevent the risk of burnout.

## 5. Prevention of occupational hazards

GREEN POWER TECHNOLOGIE implements an occupational risk prevention approach based on the following principles:

- Risk Assessment: The company is committed to identifying, assessing, and preventing occupational risks by regularly updating its Single Document for the Assessment of Occupational Risks (DUERP), involving managers and employee representatives, in accordance with Article R4121-1 of the Labor Code.
- Prevention of Harassment: GREEN POWER TECHNOLOGIE undertakes to prevent and combat all forms of harassment by strengthening its systems for reporting and dealing with such situations, in particular through the aforementioned Charter on systems for reporting acts of violence, discrimination, moral or sexual harassment, and sexist behavior in the workplace.
- Specific Risk Management: A health and safety policy has been put in place for technicians working with lithium batteries or other electrical equipment, employees who handle heavy loads and lifting equipment, and employees who regularly travel by car.

## 6. Audits and formations

GREEN POWER TECHNOLOGIE is committed to strengthening safety culture through concrete actions. Audits are regularly conducted in its warehouse, safety instructions are displayed and followed, and evacuation drills are carried out. Employees exposed to specific risks receive initial and ongoing training in this area.

## 7. Reporting difficulties and right of withdrawal

Management encourages communication between the Social and Economic Committee (CSE) and employees, allowing the CSE to report any situation that could adversely affect working conditions. Management undertakes to treat each report with care and to provide a personalized response. In accordance with Articles L4131-1 et seq. of the Labor Code, any employee who observes a dangerous situation has the right to exercise their right of withdrawal. GREEN POWER TECHNOLOGIE guarantees that no sanctions will be taken against an employee who legitimately exercises this right.



## 8. Provision of equipment and uniforms

GREEN POWER TECHNOLOGIE is committed to providing each employee with the necessary tools and equipment for their work, including Personal Protective Equipment (PPE) and ergonomic office equipment. The company ensures that equipment is in good working order and is regularly replaced, and it is subject to periodic checks. Wearing work clothes suitable for the tasks at hand is mandatory for employees working in the warehouse. This requirement also applies to authorized visitors.

## 9. Responsibility of employees

Every GREEN POWER TECHNOLOGIE employee is responsible for their own safety and that of their colleagues. As such, employees are required to complete mandatory training and put the knowledge they have acquired into practice, use the protective equipment provided and ensure it is in good condition, and report any dangerous situations or safety-related malfunctions to their managers or members of the Social and Economic Committee (CSE).





# Part 4

## 0 TOLERANCE FOR VIOLENCE, DISCRIMINATION AND HARASSMENT



GREEN POWER TECHNOLOGIE has a zero-tolerance policy towards all forms of violence, discrimination, and harassment, whether physical, verbal, or psychological. The company is committed to implementing concrete measures to prevent such behavior, promote equal opportunities, and ensure that all employees can work in an environment free from any form of harassment or discrimination.

## 1. Definitions

### **Sexist behaviors**

The law of August 17, 2015 introduced the concept of sexist behavior into the Labor Code to combat the “everyday sexism” that employees may face. Sexist behavior, defined by Article L1142-2-1 of the Labor Code, is any behavior related to a person's gender that has the effect of undermining their dignity or creating a hostile, degrading, or offensive environment. In its 2015 report, the High Council for Professional Equality between Women and Men illustrated various forms of everyday sexism, such as:

- Sexist jokes and remarks
- Gender-based incivility (e.g., interrupting a female colleague)
- Familiar forms of address (e.g., “my dear,” “my sweetheart”)
- False seduction (e.g., comments about clothing)
- Benevolent sexism (e.g., praising a female manager by referring to stereotypical qualities)
- Sexist comments about motherhood or family responsibilities (e.g., pointing out that a female employee is absent from an evening event for family reasons)



**Sexual behaviors**

Sexual harassment, defined in Article 222-33 of the Penal Code, consists of repeatedly imposing comments or behavior of a sexual or sexist nature that undermine the dignity of the victim or create a hostile, intimidating, or offensive environment. It also includes pressuring someone to engage in a sexual act, even if this is not repeated. The victim's lack of consent, manifested by silence or avoidance behavior, is a key element of sexual harassment. The law does not require the victim to explicitly express their lack of consent, and there does not need to be a hierarchical relationship between the perpetrator and the victim.

Acts of harassment may be committed repeatedly, with no specific time interval required between each incident. Sexual harassment can occur in both professional and private settings. The most common forms are verbal: obscene jokes, persistent comments about the victim's physical appearance, clothing, or sex life, as well as attempts at inappropriate intimacy. Harassment can also take the form of written comments or nonverbal behavior such as insistent stares, suggestive gestures, or attempts at unprofessional physical proximity.

**Acts of discrimination**

Discrimination is prohibited by Articles 225-1 to 225-4 of the Penal Code. Discrimination is characterized by less favorable treatment of a person in a situation comparable to another, based on at least one ground prohibited by law (e.g., gender, age, health status, etc.). Discrimination can be direct or indirect (when, under the guise of neutrality, a decision has discriminatory effects). Discriminatory intent may be expressed in writing or verbally, but may also be inferred from other behaviors when these behaviors establish the discriminatory grounds. It should be noted that differences in treatment that meet a legitimate objective and comply with the principle of proportionality are excluded from this definition.

Discrimination is prohibited at all stages of a person's career, from the recruitment phase and throughout their career, particularly in terms of: remuneration, training, assignment, evaluation, retirement, tenure, dismissal, professional promotion, contract renewal, and transfer, without this list being exhaustive.

## **Moral harassment**

Moral harassment, as defined by Articles 222-33-2 to 222-33-2-3 of the Penal Code, is characterized by repeated comments or behavior that degrades working conditions and undermines the dignity, health, or professional future of the victim. It is punishable by two years' imprisonment and a fine of €30,000. It can take the form of jokes, incivility, bullying, ostracism, or unjustified criticism. These actions may come from a superior, a colleague, or someone outside the company. Moral harassment is punishable by disciplinary action

## **Acts of violence**

Acts of violence refer to any acts that harm a person's physical or psychological integrity. In criminal law, acts of violence are offenses or misdemeanors defined and punished by Articles 222-7 et seq. and R624-1 and R625-1 of the Penal Code. The degree of seriousness and the penalties incurred depend on the harm suffered by the victim.

Physical violence can take the form of blows, injuries, or any other bodily harm. Psychological violence includes acts or words intended to humiliate, isolate, destabilize, or degrade a person. Verbal violence includes insults, threats, degrading or discriminatory remarks, and any form of psychological harassment. Sexual violence is characterized by any sexual assault committed without the victim's consent. It is essential to remember that consent must be free, informed, and revocable at any time.

These acts, whether physical, psychological, verbal, or sexual, constitute serious breaches of an employee's duties and are incompatible with the obligation of dignity and respect inherent in their position.

## 2. Whistleblowing system

GREEN POWER TECHNOLOGIE has set up an internal reporting system to facilitate the handling of situations involving violence, discrimination, moral or sexual harassment, and sexist behavior in the workplace. A representative has been appointed to receive and handle these reports confidentially. Employees or partners who believe they are victims of or witnesses to such behavior are invited to contact the representative at [signalement@greenpower-technologie.com](mailto:signalement@greenpower-technologie.com). They may also request a telephone interview, if necessary. Reports must be detailed and, if possible, accompanied by evidence. Individuals who do not speak the local language may seek assistance from a third party, and reports may be made in English. Once the report has been received, the representative will conduct an initial review to assess its admissibility. If the report is deemed admissible, the author will be informed of the follow-up and planned action. This process ensures that the confidentiality of the identities of the persons concerned and the facts reported is respected. In the event of a conflict of interest, a delegate will take over. Precautionary and protective measures will be taken if necessary.

**The approach encourages a healthy and respectful working environment in which sexist behavior, violence, and harassment are not tolerated.**

## 3. Handling of reported incidents

When a report is deemed admissible, an internal investigation is initiated under the leadership of the representative in charge of situations involving violence, discrimination, moral or sexual harassment, and sexist behavior.

## 5. Measures that may be implemented following the report

Depending on the results of the investigation, disciplinary measures may be considered in accordance with GREEN POWER TECHNOLOGIE's Internal Regulations.

## 4. Protective measures that may be implemented following a report

Without prejudice to the action that will be taken in response to the report, the representative in charge of situations of violence, discrimination, moral or sexual harassment, and sexist behavior at work will assess the situation in conjunction with the Legal Department and, in urgent cases, may be required to take any protective measures necessary to put an end to the reported behavior as quickly as possible, restore the normal functioning of the department, and ensure the protection of the alleged victim and witnesses.

# Part 5

## USE OF COMPUTER AND DIGITAL RESOURCES





## 1. General Terms and Conditions of Use

The use of information and communication technologies within GREEN POWER TECHNOLOGIE must meet the requirements of availability, confidentiality, and integrity of the data processed. It must also respect the company's image, the legal and regulatory obligations in force, and the principles of individual responsibility of users. The IT tools, in particular workstations, software, email, and means of communication provided by GREEN POWER TECHNOLOGIE, are intended exclusively for professional use. Any use for personal purposes must remain exceptional, reasonable, and must not compromise the security or proper functioning of the systems

## 2. Good Practices and Prohibited Conduct

It is strictly forbidden to use professional means of communication (in particular email) to disseminate or exchange content that is:

Discriminatory, sexist, racist, xenophobic, homophobic, or child pornography

Contrary to public decency or the law

Damaging to the company's image or the dignity of individuals

Any breach of these rules may result in disciplinary action and, where applicable, legal proceedings.

## 3. Prohibition on the Use of Personal Equipment

Unless prior written authorization has been obtained from the Information Systems Department (ISD), the use of any personal equipment (computers, tablets, smartphones, USB drives, external hard drives, or other devices) for professional purposes or to connect to the company's information systems is strictly prohibited. This prohibition is intended to:

Ensure data security

Prevent any risk of information leaks or cyberattacks

Ensure compatibility with current security protocols

Preserve employees' right to disconnect

Any failure to comply with this rule constitutes a breach of security obligations and may result in disciplinary measures in accordance with the Internal Regulations and applicable legal texts.





#### 4. Expected Commitments from Partners Regarding Digital Security

As part of their relationship with GREEN POWER TECHNOLOGIE, Customers are also required to comply with basic digital security rules in order to ensure smooth, secure collaboration that meets our standards. As such, Customers are expected to:

- Use digital tools and access provided to them responsibly, exclusively within the scope of the mission or service provided
- Comply with the IT security measures put in place by GREEN POWER TECHNOLOGIE (passwords, confidentiality, restricted access, etc.)
- Refrain from any attempt to intrude into GREEN POWER TECHNOLOGIE's information systems or to access data without authorization
- Do not transfer any documents or files containing malware or that could compromise the integrity of our infrastructure



# Part 6

## PRIVACY AND DATA PROTECTION POLICY



GREEN POWER TECHNOLOGIE attaches the utmost importance to protecting its Users' personal data and complies with applicable regulations, in particular Law No. 78-17 of January 6, 1978 on information technology, files, and civil liberties, the law of June 21, 2014 on confidence in the Digital Economy, the Data Protection Act of August 6, 2004, and the General Data Protection Regulation of April 27, 2016, No. 2016-679 (hereinafter GDPR), imposing the following obligations in particular:

- Lawfulness of processing: Data processing must be based on at least one legal basis provided for by the GDPR (consent, purpose limitation, data minimization, storage limitation, right to be forgotten).
- Transparency: Data subjects must be informed in a clear, precise, and understandable manner about how their data is processed.
- Integrity and confidentiality: Data must be processed in a manner that ensures its security and confidentiality.
- Accountability: GREEN POWER TECHNOLOGIE must be able to demonstrate its compliance with the GDPR.

## 1. Scope of application

As a company operating on an international scale, GREEN POWER TECHNOLOGIE may need to transfer personal data outside the European Union and the European Economic Area. In such cases, GREEN POWER TECHNOLOGIE commits to ensuring that these transfers comply with all legal requirements, to informing the individuals concerned of any transfer of their personal data outside the EU, and to providing them with the necessary information to exercise their rights.

## 2. Purposes of the data collected

### A. Navigation and services

The data collected enables the management of navigation on GREEN POWER TECHNOLOGIE websites, as well as the traceability of services. This includes:

Identification data: Last name, first name, address, telephone number, email address, customer ID;

Connection data: IP address, pages visited, duration of visit, browser type, cookies (with consent);

- Order-related data: History, product details, payment information (without storing sensitive banking data), delivery tracking, complaints.

### B. Security and fight against fraud

Data is processed to prevent fraud, including spamming and hacking. This includes:

- Technical data: IP address, device type, operating system, connection logs, session IDs
- Behavioral data: Suspicious behavior such as multiple login attempts

### C. Site improvement

In order to optimize the user experience, the following data may be processed:

Usage data: Pages visited, bounce rate, time spent, site performance, errors encountered, audience analysis (anonymized data).

GREEN POWER TECHNOLOGIE will retain the data collected in this way for a period of two years, covering the applicable contractual civil liability limitation period



### 3. Recipient of personal data

Personal data collected by GREEN POWER TECHNOLOGIE is transmitted in accordance with the terms described in this Privacy and Data Protection Policy, namely:

#### A. Transmission to manufacturers

In order to ensure the proper execution of orders, delivery of products, and management of commercial relationships based on business volume, certain personal data and commercial information may be transmitted to GREEN POWER TECHNOLOGIE manufacturers. For product delivery, this includes:

- Identification data (last name, first name, delivery address, phone number, email address);
- Order details (product references, quantities, order date);
- Any other information strictly necessary for delivery.

For the management of commercial relationships:

- Turnover generated with the customer concerned;
- The volume of orders placed;
- The history of commercial relationships.

**GREEN POWER TECHNOLOGIE manufacturers comply with confidentiality obligations that are at least as strict as those stipulated in this Privacy and Data Protection Policy; contractual agreements govern these data transfers in order to guarantee their protection.**

#### B. No transfer to third parties for commercial purposes

Except for the transfers to manufacturers mentioned above and cases where we are required to do so by law, personal data processed will not be transferred, rented, sold, exchanged, or shared with third parties for commercial, advertising, or direct marketing purposes without prior and explicit consent.

#### C. Sensitive data

GREEN POWER TECHNOLOGIE does not collect any customer data considered “sensitive” within the meaning of Article 9 of the GDPR (data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation).

#### 4. Non-Disclosure and Transfer of Personal Data

No personal information about the User is published without their knowledge, nor is it exchanged, transferred, assigned, or sold on any medium whatsoever to third parties, except in cases expressly provided for by law or with their prior informed consent.

Only in the event of a merger, acquisition, or sale of GREEN POWER TECHNOLOGIE and its assets, involving the transfer of personal data, would such information be transmitted to the potential purchaser. In this case, the latter would in turn be bound by the same security, confidentiality, and information obligations towards Users, in accordance with the regulations in force.

#### 5. Data security and confidentiality

GREEN POWER TECHNOLOGIE implements appropriate technical and organizational measures to ensure the security and confidentiality of Users' personal data, and in particular to prevent it from being distorted, damaged, or accessed by unauthorized third parties. These measures include standard devices such as firewalls, data anonymization and encryption, and password management. However, the User is aware that no method of transmission over the Internet and no method of electronic storage is completely secure.

#### 6. User rights

In accordance with current European regulations, Users have the following rights:

- Right of access (Article 15 GDPR), rectification (Article 16 GDPR), updating, and completeness of data
- Right to block or erase data (Article 17 of the GDPR) when it is inaccurate, incomplete, ambiguous, outdated, or whose collection, use, communication, or storage is prohibited
- Right to withdraw consent at any time (Article 13-2c GDPR)
- Right to restrict data processing (Article 18 GDPR)
- Right to object to data processing (Article 21 GDPR)
- Right to data portability, where the data is processed automatically on the basis of consent or a contract (Article 20 GDPR)
- Right to determine the fate of data after death and to choose to whom GREEN POWER TECHNOLOGIE must (or must not) communicate this data

## 7. Notification of personal data breaches

In the event of a personal data breach that may pose a risk to the rights and freedoms of natural persons, GREEN POWER TECHNOLOGIE undertakes to notify the competent supervisory authority of the breach as soon as possible and, if possible, no later than 72 hours after becoming aware of it, in accordance with Article 33 of the GDPR.

GREEN POWER TECHNOLOGIE also undertakes to inform the Users affected by this breach as soon as possible, when this breach is likely to pose a high risk to their rights and freedoms, in accordance with Article 34 of the GDPR. This notification shall contain at least the following information:

- The nature of the breach
- The categories and approximate number of individuals affected
- The categories and approximate number of personal data records affected
- The likely consequences of the breach
- The measures taken or proposed to address the breach, including, where appropriate, measures to mitigate any possible adverse effects

## 8. Data controller and how to exercise your rights

Any person whose personal data is processed by GREEN POWER TECHNOLOGIE may, at any time, request the erasure of their personal data in the following cases:

- If the data is no longer necessary for the purposes for which it was collected or processed
- If the data subject withdraws their consent on which the processing is based and there is no other legal basis for the processing
- If the data subject objects to the processing of their personal data and there is no compelling legitimate reason for the processing, or they object to the processing for marketing purposes

These rights may be exercised by contacting the person responsible for processing the Personal Data (hereinafter “DPO”) collected. The DPO's duties are as follows :

- Informing and advising management and employees on their data protection obligations
- Monitoring the company's compliance with the GDPR
- Cooperating with the supervisory authority (CNIL in France) in the event of a request
- Providing a point of contact for data subjects and responding to their requests



To do so, he or she has the following resources at his or her disposal:

- Direct access to senior management
- The necessary human resources
- Access to all information necessary for the performance of his or her duties

The DPO performs his or her duties independently and cannot receive instructions regarding the performance of his or her duties. The DPO's term of office is indefinite.

As part of its commitment to the protection of personal data, GREEN POWER TECHNOLOGIE has appointed a Data Protection Officer (DPO) in accordance with the General Data Protection Regulation (GDPR). The DPO is Ms. Vanessa Castagne, Director of Human Resources. To contact her:

- By mail : **GREEN POWER TECHNOLOGIE** — DPO, **Vanessa Castagne**, Parc activité La Gravelle Sud, Zone Écoparc, 53410 LA GRAVELLE
- By email : [vanessa.castagne@greenpower-technologie.com](mailto:vanessa.castagne@greenpower-technologie.com)

Upon receipt of a request, the Data Protection Officer will verify its validity in light of the above criteria, delete the data concerned as soon as possible, and inform the person concerned in writing.

Users may also lodge a complaint with the supervisory authorities, in particular the CNIL.

# CONCLUSION

This Code of Conduct embodies GREEN POWER TECHNOLOGIE's values, commitments, and requirements in terms of ethics, respect, responsibility, and professionalism. It provides a common foundation to guide behavior, foster a climate of trust, and ensure the smooth functioning of internal and external relationships.

All employees, partners, and customers are encouraged to refer to it in their daily activities in order to actively contribute to a culture based on integrity, transparency, and security. Compliance with these principles is essential to guarantee the quality of our services, the protection of our stakeholders, and the reputation of GREEN POWER TECHNOLOGIE.

Adherence to the Code of Conduct commits everyone to adopting a responsible and exemplary attitude.

**TOGETHER, LET US AFFIRM OUR COMMITMENT TO SUSTAINABLE AND SECURE GROWTH**



**ANTOINE CHOFFEZ**  
DIRECTEUR GÉNÉRAL



**ARNAUD SOURDRILLE**  
PRESIDENT