

John Cockerill Group Compliance and Ethics Charter

June 2023

The John Cockerill Group develops large-scale technological solutions to meet the needs of its time, as part of a balanced, profitable and sustainable growth model that creates value for its customers, employees, shareholders, partners, the communities in which it operates and the planet. Being compliant and ethical in its relations with all its stakeholders contributes to this commitment. This charter and the associated code of conduct bear witness to this.

Compliance means legal conformity with all rules applicable to the Group and its entities, as imposed by applicable laws and regulations. Being ethical means respecting additional rules that influence professional behavior and that the Group has decided to impose on itself, even if they do not correspond to applicable laws and regulations.

The John Cockerill Group's compliance and ethics program is based on a compliance and ethics code of conduct and detailed associated procedures, a governance system, a whistle-blowing system, risk mapping, awareness and training programs, and an assessment system.

The Group's compliance and ethics code of conduct covers the main areas of vigilance, mainly human rights, the environment, business management, third parties, export control and dual use.

Within the Group, compliance and ethics are overseen by dedicated governance bodies. The highest authorities concerned are the Group Board of Directors for ethics and the Group CEO for compliance. Compliance and ethics risk management is based on risk mapping carried out at regular intervals, as provided for by the Sapin 2 Act in the Group's areas where this law is applicable.

All Group documents relating to compliance and ethics are available on the Group intranet. The awareness-raising and training programs organized on these subjects do not exempt each member of staff from seeking information if he or she feels that he or she does not have sufficient information. All employees faced with a compliance or ethics issue can also refer the matter to their line manager, or use the Group's whistleblowing system via the online platform or <u>ethics@johncockerill.com</u>. Requests will be dealt with quickly and confidentially, either directly or after consulting the appropriate committees.

The members of the Board of Directors and the Management Board, as well as the entire hierarchical line, respect the principles of John Cockerill's Compliance and Ethics Code of Conduct. They are responsible for ensuring that these principles are applied within their respective areas of responsibility, and for dealing diligently with any compliance and ethics issues that may be brought to their attention. Finally, they undertake to take the necessary sanctions against any person who deliberately ignores the practices to be respected, in full transparency with the dedicated governance bodies.

Bernard Serin President François Michel CEO